



# CITY OF HOLLYWOOD FLORIDA

## **SOLICITATION RFQ-4659-21-PB INVESTMENT MANAGEMENT SERVICES**

**December 14<sup>th</sup>, 2020**



**CHANDLER ASSET MANAGEMENT**  
801 International Parkway, Suite 500  
Lake Mary, Florida 32746  
Direct: 407.902.4695 | Toll Free: 800.317.4747  
[mhamilton@chandlerasset.com](mailto:mhamilton@chandlerasset.com)  
[www.chandlerasset.com](http://www.chandlerasset.com)

December 14, 2020

City of Hollywood  
Paul Bassar, *Chief Procurement Officer*  
David E. Keller, *Interim Director of Financial Services*  
City Hall, 2600 Hollywood Boulevard  
Hollywood, Florida 33022

**Submitted via email:** [pbassar@hollywoodfl.org](mailto:pbassar@hollywoodfl.org) and [dkeller@hollywoodfl.org](mailto:dkeller@hollywoodfl.org)

**RE: Solicitation RFQ-4659-21-PB; Investment Management Services**

Dear Mr. Bassar and Mr. Keller,

On behalf of *Chandler Asset Management, Inc.*, we thank you for the opportunity to submit our firm's proposal and present our qualifications to provide investment management services for the **City of Hollywood, Florida**. Chandler is an SEC-registered investment adviser founded on the tenets of public agency investing. Our firm has provided comprehensive investment solutions for local governments across the nation just like the City, who are guided by the objectives of safety, liquidity, and yield/return, for over thirty years. Founded by investment officers for public agencies, we provide access to advice and investment manager analysis while bringing clients a personalized and local perspective. As of September 30, 2020, Chandler manages over **\$21 billion in firm-wide assets**, including over *71 cities*. Since 1988, Chandler has assisted local governments in fulfilling their fiduciary duty to their constituents by providing high quality fixed income portfolios in a prudent investment framework. We utilize investment securities and strategies that conform to the City's investment policy, applicable federal laws, and Florida Statutes regarding qualified investments for public entities.

Our focus is on separately managed accounts. We do not manage local government investment pools, therefore dedicating 100% of our resources to managing our individual clients' portfolios and providing customization, transparency, and flexibility through the ownership of ***individually owned securities***. Our \$21 billion in assets under management reflect investment strategies for portfolios similar to the services requested in your RFP and do not include additional assets such as investments in advisory-only accounts, local government investment pools, or brokered CDs.

We have reviewed the City's investment policy and current investment holdings and believe that we can add significant value to your investment program through the strategies summarized below, and explained in greater detail in our proposal:

- Confirm that the City's investment policy complies with Florida Statutes, encompasses the latest industry best practices, and meets the City's preferences for ensuring safety and liquidity while optimizing investment return;
- Work with City staff to analyze cash requirements in order to optimize the allocation between funds needed for liquidity and funds that can be invested in longer-term investment strategies designed to optimize return;
- Seek to enhance the diversification of the City's portfolio by considering the investment options permitted by Florida Statutes, subject to the City's risk tolerance and;
- Develop a comprehensive investment strategy that supports the City's financial goals, current budgetary objectives, and long-term general plan. The strategy will seek to increase interest income as well as protect and enhance portfolio market value by actively diversifying sectors, issuers, and maturities.

Our commitment to providing personalized client service is equal to our commitment to meeting investment objectives, and is reflected in the following:

**We understand your investment perspective.** Chandler was founded by investment officers of large public agencies based on the same principles of investment management that guide the City of Hollywood. We understand your goals of increasing returns and minimizing unrealized losses and will work hard to support all the City's financial objectives while enhancing safety and providing liquidity within the operating policies. We believe working with Chandler can add value to the City's investment program safely by repositioning the portfolio maturity structure and sector allocations to generate incremental income and preserve market value consistent with the comfort level of City staff.

**We understand public agency investing in Florida.** The City's assigned key contacts, **Scott Prickett, CTP**, *Deputy Chief Investment Officer*, **Julie Hughes**, *Senior Portfolio Strategist*, and **Mel Hamilton**, *Senior Relationship Manager*, have over two decades of experience managing portfolios for public sector clients and have worked in the state of Florida extensively. All are active in organizations relevant to public fund investment best practices, including the Government Finance Officers Association (GFOA) and the Florida GFOA. Scott Prickett, Julie Hughes, and Mel Hamilton along with our team of investment and service professionals will serve the City and will be available to the City for frequent in-person meetings and as a local resource.

**We are committed to client success.** We are dedicated to our role as fiduciaries to our clients and understand the public role that your investment staff has in the stewardship of taxpayer funds. The firm invests in best-in-class technology and resources that assist our investment professionals to develop both long-term and short-term strategies that are significant to the overall financial program. Chandler's proprietary *Client Portal* provides historical reports and transparency for the entire investment program, including:

Portfolio Reports	Holdings Reports
<ul style="list-style-type: none"><li>• <i>Portfolio Cost/Book/Market Value</i></li></ul>	<ul style="list-style-type: none"><li>• <i>Holdings &amp; Transactions</i></li></ul>
<ul style="list-style-type: none"><li>• <i>Portfolio Characteristics</i></li></ul>	<ul style="list-style-type: none"><li>• <i>Accretion/Amortization</i></li></ul>
<ul style="list-style-type: none"><li>• <i>Sector Allocation</i></li></ul>	<ul style="list-style-type: none"><li>• <i>GASB 40 &amp; GASB 72 reports</i></li></ul>
<ul style="list-style-type: none"><li>• <i>Duration &amp; Maturity Distribution</i></li></ul>	<ul style="list-style-type: none"><li>• <i>Custom interface to City's internal reports</i></li></ul>

We are immensely proud of our client retention record, which we attribute to our belief that *"if we do what is right for our clients, our own success will follow."*

**We utilize investment strategies that we have managed for over thirty years.** Chandler's GIPS-compliant reports include over eight (8) strategies with an established track record of preserving our client's principal value and exceeding performance benchmarks over multiple market cycles of both falling and rising rates.

Chandler is a 100% independent and employee-owned firm. We do not currently have, nor do we potentially foresee any conflicts of interest that could be perceived as affecting the objectivity of our advice in the management of the City's account. We commit to disclose any potential conflicts of interest, including those that could be seen as a beneficial relationship that would abuse our position of trust and responsibility, in the unlikely event that one arises.

Chandler Asset Management conforms to the Code of Ethics and Standards of Professional Conduct as put forth by the CFA Institute. Chandler has seven employees on our portfolio management team who hold the CFA designation, however all Chandler employees also abide by these standards, placing our clients' interests and the integrity of the investment management profession above our own and pledging to act with integrity, competence and respect in all matters related to our advisory and investment management business.

Chandler will act as a fiduciary to the City, putting your interests ahead of our own and pledging to act only with the highest ethical standards in all of our investment management activities and dealings. Chandler's



fiduciary obligations are detailed in the firm's comprehensive *Code of Ethics* manual that is adopted and demonstrated by the firm and all of its employees.

As the firm's CEO and Chief Investment Officer, I am authorized to bind the firm and to act in this capacity, as well as confirm our commitment to performing the City's scope of services in a timely manner. I certify that all the information provided in our proposal is accurate, firm and irrevocable, and shall be valid for a period of at least one hundred twenty (120) days from December 14, 2020.

We look forward to discussing our qualifications to serve as the City's investment manager in more detail. If you have any questions during the proposal evaluation phase, please contact **Mel Hamilton**, *Senior Relationship Manager* at (407) 902-4695 or via email at [mhamilton@chandlerasset.com](mailto:mhamilton@chandlerasset.com).

Sincerely,

**CHANDLER ASSET MANAGEMENT, INC**

A handwritten signature in blue ink, appearing to read 'Martin D. Cassell', is written over the company name.

**Martin D. Cassell, CFA**  
*CEO, Chief Investment Officer*



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**CHANDLER APPENDICES**

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<i>State of Florida sunbiz.com Certificate of Corporation</i>	<i>Appendix B</i>
<i>Professional Biographies</i>	<i>Appendix C</i>
<i>Global Investment Performance Standards (GIPS®) and Verification Letter</i>	<i>Appendix D</i>
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<i>ACORD Certificate of Liability</i>	<i>Appendix F</i>
<i>Sample Client Monthly Statement, Quarterly Report, and GASB 40 and 72 Reports</i>	<i>Appendix G</i>
<i>Sample Investment Management Agreement</i>	<i>Appendix H</i>

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**2.3.3 TAB 1 - TRANSMITTAL LETTER**

Please see Chandler's *Transmittal Letter* preceding our technical proposal which has been signed by **Martin D. Cassell, CFA, CEO and Chief Investment Officer**, who is authorized to bind the firm and ensure the accuracy of our offer.

For any questions or clarifications during the proposal evaluation process, please contact **Mel Hamilton, Senior Relationship Manager**, per the below details:

**Mel Hamilton**

*Senior Relationship Manager*

Direct: (407) 902-4695 | Toll Free: (800) 317-4747

Email: [mhamilton@chandlerasset.com](mailto:mhamilton@chandlerasset.com)

**2.3.4 TAB 2 – COMPLETED FORMS**

*Form 1 Acknowledgement and Signature Page*

*Form 2 Hold Harmless and Indemnity Clause*

*Form 3 Non-Collusion Affidavit*

*Form 4 Public Entity Crimes*

*Form 5 Certificate Regarding Disbarment*

*Form 6 Drug Free Workplace*

*Form 7 Fee Schedule*

*Form 8 Acknowledgement of Addenda*

*Form 9 Independence*

## SECTION 5

### RFQ FORMS

The forms located in this section of the RFQ Documents shall be included in the RFQ PDF file and shall be unaltered. Forms not completed in full may result in disqualification.

[THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK]



# FORM 1

## ACKNOWLEDGMENT AND SIGNATURE PAGE

This form must be completed and submitted by the date and the time of RFQ opening.

**Chandler Asset Management, Inc.**

Legal Company Name (include d/b/a if applicable):

33-0570869

Federal Tax Identification Number: If Corporation -

Date Incorporated/Organized:

7/12/1993

State Incorporated/Organized: Company California

Operating Address:

801 International Parkway, Suite 500

City

Lake Mary

State

Florida

Zip Code

32746

Remittance Address (if different from ordering address):

6225 Lusk Boulevard

City

San Diego

State

California

Zip Code

92121

Company Contact Person:

Mel Hamilton, Senior Relationship Manager

Email Address:

mhamilton@chandlerasset.com

Phone Number (include area code): (407) 902-4695

Fax Number (include area code): (858) 546-3741

Company's Internet Web Address:

www.chandlerasset.com

IT IS HEREBY CERTIFIED AND AFFIRMED THAT THE SUBMITTER CERTIFIES ACCEPTANCE OF THE TERMS, CONDITIONS, SPECIFICATIONS, ATTACHMENTS AND ANY ADDENDA. THE SUBMITTER SHALL ACCEPT ANY AWARDS MADE AS A RESULT OF THIS SOLICITATION. SUBMITTER FURTHER AGREES THAT PRICES QUOTED WILL REMAIN FIXED FOR THE PERIOD OF TIME STATED IN THE SOLICITATION.

Submitter's Authorized Representative's Signature:

Date

December 10, 2020

Type or Print Name:

Martin D. Cassell, CFA

THE EXECUTION OF THIS FORM CONSTITUTES THE UNEQUIVOCAL OFFER OF SUBMITTER TO BE BOUND BY THE TERMS OF ITS SUBMITTAL. FAILURE TO SIGN THIS SOLICITATION WHERE INDICATED BY AN AUTHORIZED REPRESENTATIVE SHALL RENDER THE RFQ/SUBMITTAL NON-RESPONSIVE. THE CITY MAY, HOWEVER, IN ITS SOLE DISCRETION, ACCEPT ANY RFQ/SUBMITTAL THAT INCLUDES AN EXECUTED DOCUMENT WHICH UNEQUIVOCALLY BINDS THE SUBMITTER TO THE TERMS OF ITS OFFER.

Issue Date

November 9, 2020

## SUBMISSION

Submittal Due Date:

December 10, 2020 3:00P.M. EST

**Revised due date as per Addendum #2:** December 14, 2020

How to submit RFQs/Submittals: Vendor's solicitation response may be submitted electronically via email to the email addresses stipulated above. It is the Vendor's sole responsibility to assure its response is submitted and received by the date and time specified in the solicitation. Any timeframe references are in Eastern Standard Time. The official time for electronic submittals is the inbox email receipt time of the Chief Procurement Officer. All parties without reservation will accept the official time.

### Important Notice:

The Procurement Services Division shall distribute all official changes, modifications, responses to questions or notices relating to the requirements of this document. Any other information of any kind from any other source shall not be considered official, and Submitters relying on other information do so at their own risk.

The responsibility for submitting a RFQ/Submittal on or before the time and date is solely and strictly the responsibility of the Submitter, the City will in no way be responsible for delays caused by technical difficulty or caused by any other occurrence. No variation in price or conditions shall be permitted based upon a claim of ignorance.


## FORM 2

### HOLD HARMLESS AND INDEMNITY CLAUSE

Chandler Asset Management, Inc.

(Company Name and Authorized Signature, Print Name)

, the contractor, shall indemnify, defend and hold harmless the City of Hollywood, its elected and appointed officials, employees and agents for any and all suits, actions, legal or administrative proceedings, claims, damage, liabilities, interest, attorney's fees, costs of any kind whether arising prior to the start of activities or following the completion or acceptance and in any manner directly or indirectly caused, occasioned or contributed to in whole or in part by reason of any act, error or omission, fault or negligence whether active or passive by the contractor, or anyone acting under its direction, control, or on its behalf in connection with or incident to its performance of the contract.

Signature		Printed Name	Martin D. Cassell, CFA
Name of Company	Chandler Asset Management, Inc.	Title	CEO and Chief Investment Officer

RFQ/RFP/RFQ Number: RFQ-4659-21-PB Title: Investment Management Services

Division of Procurement Services  
2600 Hollywood Boulevard, Room 303  
Hollywood, Florida 33020

FORM 3  
NON COLLUSION AFFIDAVIT

STATE OF:

California

COUNTY OF:

San Diego

, being first duly sworn, deposes and says that: <sup>(1)</sup>

He/she is CEO and CIO of Chandler Asset Management, Inc., the  
Submitter that has submitted the attached  
RFQ.

- (2) He/she has been fully informed regarding the preparation and contents of the attached RFQ and of all pertinent circumstances regarding such RFQ;
- (3) Such RFQ is genuine and is not a collusion or sham RFQ;
- (4) Neither the said Submitter nor any of its officers, partners, owners, agents, representatives, employees or parties in interest, including this affiant has in any way colluded, conspired, connived or agreed, directly or indirectly with any other Submitter, firm or person to submit a collusive or sham RFQ in connection with the contractor for which the attached RFQ has been submitted or to refrain from Bidding in connection with such contract, or has in any manner, directly or indirectly, sought by agreement or collusion or communication or conference with any other Submitter, firm or person to fix the price or prices, profit or cost element of the RFQ price or the RFQ price of any other Submitter, or to secure an advantage against the City of Hollywood or any person interested in the proposed Contract; and
- (5) The price or prices quoted in the attached RFQ are fair and proper and are not tainted by any collusion, conspiracy, connivance or unlawful agreement on the part of the Submitter or any of its agents, representatives, owners, employees, or parties in interest, including this affiant.

Signature



Printed Name

Martin D. Cassell, CFA

Name of Company

Chandler Asset Management, Inc.

Title

CEO and Chief Investment Officer



## FORM 4

SWORN STATEMENT PURSUANT TO SECTION 287.133 (3) (a)  
FLORIDA STATUTES ON PUBLIC ENTITY CRIMES

1. This form statement is submitted to The City of Hollywood, Florida  
By \_\_\_\_\_ for Martin D. Cassell, CFA, CEO and CIO of Chandler Asset Management, Inc.  
(Print individual's name and title) (Print name of entity submitting sworn statement)  
whose business address is 6225 Lusk Boulevard, San Diego, CA 92121  
and if applicable its Federal Employer Identification Number (FEIN) is 33-0570869 If the entity has no FEIN, include the Social Security Number of the individual signing this sworn statement.

2. I understand that "public entity crime," as defined in paragraph 287.133(1)(g), Florida Statutes, means a violation of any state or federal law by a person with respect to and directly related to the transaction of business with any public entity or with an agency or political subdivision of any other state or with the United States, including, but not limited to, any RFQ, Submittal, reply, or contract for goods or services, any lease for real property, or any contract for the construction or repair of a public building or public work, involving antitrust, fraud, theft, bribery, collusion, racketeering, conspiracy, or material misinterpretation.

3. I understand that "convicted" or "conviction" as defined in Paragraph 287.133(1)(b), Florida Statutes, means a finding of guilt or a conviction of a public entity crime, with or without an adjudication of guilt, in an federal or state trial court of record relating to charges brought by indictment or information after July 1, 1989, as a result of a jury verdict, nonjury trial, or entry of a plea of guilty or nolo contendere.

4. I understand that "Affiliate," as defined in paragraph 287.133(1)(a), Florida Statutes, means:

1. A predecessor or successor of a person convicted of a public entity crime, or
2. An entity under the control of any natural person who is active in the management of the entity and who has been convicted of a public entity crime. The term "affiliate" includes those officers, directors, executives, partners, shareholders, employees, members, and agents who are active in the management of an affiliate. The ownership by one person of shares constituting a controlling interest in another person, or a pooling of equipment or income among persons when not for fair market value under an arm's length agreement, shall be a prima facie case that one person controls another person. A person who knowingly enters into a joint venture with a person who has been convicted of a public entity crime in Florida during the preceding 36 months shall be considered an affiliate.

5 I understand that "person," as defined in Paragraph 287.133(1)(e), Florida Statutes, means any natural person or any entity organized under the laws of any state or of the United States with the legal power to enter into a binding contract and which RFQs or applies to RFQ on contracts let by a public entity, or which otherwise transacts or applies to transact business with a public entity. The term "person" includes those officers, executives, partners, shareholders, employees, members, and agents who are active in management of an entity.

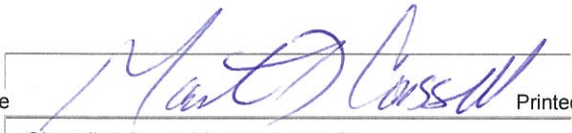
6. Based on information and belief, the statement which I have marked below is true in relation to the entity submitting this sworn statement. (Please indicate which statement applies.)

☒ X Neither the entity submitting sworn statement, nor any of its officers, director, executives, partners, shareholders, employees, members, or agents who are active in the management of the entity, nor any affiliate of the entity has been charged with and convicted of a public entity crime subsequent to July 1, 1989.

☐ The entity submitting this sworn statement, or one or more of its officers, directors, executives, partners, shareholders, employees, members, or agents who are active in the management of the entity, or an affiliate of the entity, or an affiliate of the entity has been charged with and convicted of a public entity crime subsequent to July 1, 1989.

The entity submitting this sworn statement, or one or more of its officers, directors, executives, partners, shareholders, employees, members, or agents who are active in the management of the entity, or an affiliate of the entity has been charged with and convicted of a public entity crime, but the Final Order entered by the Hearing Officer in a subsequent proceeding before a Hearing Officer of the State of the State of Florida, Division of Administrative Hearings, determined that it was not in the public interest to place the entity submitting this sworn statement on the convicted vendor list. (attach a copy of the Final Order).

I UNDERSTAND THAT THE SUBMISSION OF THIS FORM TO THE CONTRACTING OFFICER FOR THE PUBLIC ENTITY IDENTIFIED IN PARAGRAPH 1 (ONE) ABOVE IS FOR THAT PUBLIC ENTITY ONLY AND THAT THIS FORM IS VALID THROUGH DECEMBER 31 OF THE CALENDAR YEAR IN WHICH IT IS FILED. I ALSO UNDERSTAND THAT I AM REQUIRED TO INFORM THAT PUBLIC ENTITY PRIOR TO ENTERING INTO A CONTRACT IN EXCESS OF THE THRESHOLD AMOUNT PROVIDED IN SECTION 287.017 FLORIDA STATUTES FOR A CATEGORY TWO OF ANY CHANGE IN THE INFORMATION CONTAINED IN THIS FORM.

Signature		Printed Name	Martin D. Cassell, CFA
Name of Company	Chandler Asset Management, Inc.	Title	CEO and Chief Investment Officer

## FORM 5

CERTIFICATIONS REGARDING DEBARMENT, SUSPENSION  
AND OTHER RESPONSIBILITY MATTERS

The applicant certifies that it and its principals:

- (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, sentenced to a denial of Federal benefits by a State or Federal court, or voluntarily excluded from covered transactions by any Federal department or agency;
- (b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State, or local) transaction or contract under a public transaction, violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
- (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in paragraph (b) of this certification; and
- (d) Have not within a three-year period preceding this application had one or more public transactions (Federal, State, or local) terminated for cause or default.

Applicant Name and Address:

Chandler Asset Management, Inc.  
6225 Lusk Boulevard  
San Diego, California 92121

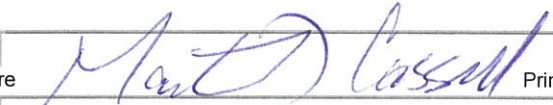
Application Number and/or Project Name:

RFQ-4659-21-PB Investment Management Services

Applicant IRS/Vendor Number:

FEIN # 33-0570869

Signature



Printed Name

Martin D. Cassell, CFA

Name of Company

Chandler Asset Management, Inc.

Title

CEO and Chief Investment Officer

Division of Procurement Services  
2600 Hollywood Boulevard, Room 303  
Hollywood, Florida 33020



## FORM 6

## DRUG-FREE WORKPLACE PROGRAM

IDENTICAL TIE RFQS - Preference shall be given to businesses with drug-free workplace programs. Whenever two or more RFQs which are equal with respect to price, quality, and service are received by the State or by any political subdivision for the procurement of commodities or contractual services, a RFQ received from a business that certifies that it has implemented a drug-free workplace program shall be given preference in the award process. Established procedures for processing tie RFQs will be followed if none of the tied vendors have a drug-free workplace program. In order to have a drug-free workplace program, a business shall:

1. Publish a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the workplace and specifying the actions that will be taken against employees for violations of such prohibition.
2. Inform employees about the dangers of drug abuse in the workplace, the business's policy of maintaining a drug-free workplace, any available drug counseling, rehabilitation, and employee assistance programs, and the penalties that may be imposed upon employees for drug abuse violations.
3. Give each employee engaged in providing the commodities or contractual services that are under RFQ a copy of the statement specified in subsection (1).
4. In the statement specified in subsection (1), notify the employee that, as a condition of working on the commodities or contractual services that are under RFQ, the employee will abide by the terms of the statement and will notify the employer of any conviction of, or plea of guilty or nolo contendere to, any violation of chapter 893 or of any controlled substance law of the United States or any state, for a violation occurring in the workplace no later than five (5) days after such conviction.
5. Impose a sanction on, or require the satisfactory participation in a drug abuse assistance or rehabilitation program (if such is available in the employee's community) by, any employee who is so convicted.
6. Make a good faith effort to continue to maintain a drug-free workplace through implementation of these requirements. As the person authorized to sign the statement, I certify that this firm complies fully with the above requirements.

VENDOR'S SIGNATURE



Martin D. Cassell, CFA

PRINTED NAME

Chandler Asset Management, Inc.

CEO and Chief Investment Officer

NAME OF COMPANY

TITLE

RFQ/RFP/RFQ Number: RFQ 4659-21-PB Title: Investment Management Services

Division of Procurement Services  
2600 Hollywood Boulevard, Room 303  
Hollywood, Florida 33020



## FORM 7

### FEES AND EXPENSE SCHEDULE

#### Fiscal Year 2020 Investment Management Services RFQ

Item	Description	Fee
1.	Management Fees	\$ **
2.	Expenses, if any*	\$

\*Expenses must be listed/explained below.

\*\*please see Chandler's proposed tiered fee schedule in basis points as a percentage of assets under management after Form 7, as well as in our proposal.

Our proposed fee schedule is all-inclusive for the services that Chandler provides, including full time investment management services, technological resources, onboarding and implementation, online access to the Chandler Client Portal, comprehensive reporting, meetings, personal visits, and educational offerings for your staff, as well as the investment advisory and treasury management support services described in the City's Scope of Services and herein Chandler's proposal.

Our fee schedule does not include charges that the City would incur for third-party custodial services, as we are not a provider of those services.

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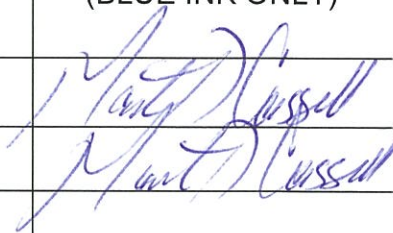
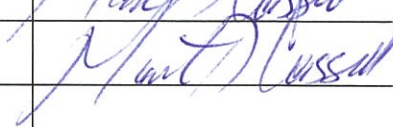
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## FORM 8

## ACKNOWLEDGMENT OF ADDENDA

The Submitter hereby acknowledges the receipt of the following addenda issued by the City and incorporated into and made part of the RFQ or the Agreement. In the event the Submitter fails to include any such addenda in the table below, submission of this form shall constitute acknowledgment of receipt of all addenda, whether or not received by the Submitter into and made part of the RFQ or the Agreement.

ADDENDUM NUMBER	DATE RECEIVED	PRINT NAME	TITLE	SIGNATURE (BLUE INK ONLY)
1	11/20/2020	Martin Cassell, CFA	CEO, CIO	
2	12/7/2020	Martin Cassell, CFA	CEO, CIO	

## FORM 9

## INDEPENDENCE AFFIDAVIT

The undersigned individual, being duly sworn, deposes and says that:

I am Martin Cassell, CFA, CEO and CIO of Chandler Asset Management, Inc., the Submitter that has submitted the attached RFQ Response;

I hereby certify to the best of my knowledge that neither I nor any of those persons residing in my household have or have had during the past five years, any relationships (professional, financial, familial or otherwise) with the City (or any of its districts), its elected or appointed officials, its employees or agents, or any member or alternate member of City Staff.

A "relationship" for the purpose of this affidavit shall include but not be limited to employer/employee, consultant, contractor, subcontractor, associate, officer, partnership, joint venture, ownership greater than one percent, landlord/tenant, or creditor/debtor, gift donor/recipient (in excess of \$100.00), past or on-going personal relationships, or joint involvement with charitable/voluntary activities. **Relationship includes having a prior or current contract with the City.**

Except as set forth below, I hereby certify to the best of my knowledge that neither I nor any of those persons residing in my household have received any promise of compensation, remuneration, gift, discount, or other gratuity in exchange for my RFQ.

I understand and agree that I shall give the City written notice of any other relationships (as defined above) that I enter into with the City (or any of its districts), its elected or appointed officials, its employees or agents, or any member or alternate member of the City Staff during the period of the Agreement.

I set forth below any exceptions to the aforementioned (**if none, write "None":**):

None.

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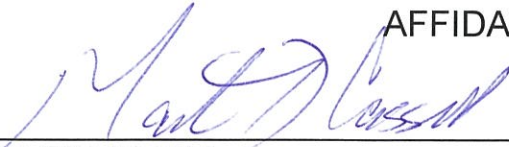
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FORM 9

INDEPENDENCE

AFFIDAVIT (CONTINUED)



\_\_\_\_\_  
Signature (Blue ink only)

\_\_\_\_\_  
Martin D. Cassell, CFA

Print Name

\_\_\_\_\_  
CEO, Chief Investment Officer

Title

\_\_\_\_\_  
December 10th, 2020

Date



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**2.3.5 TAB 3 – FIRM BACKGROUND****a) Describe the organization, date founded, office location and ownership of the firm.**

Chandler Asset Management Inc.'s core expertise is providing fully customized, high quality fixed-income investment advisory services for public agency clients. Municipalities and other local governments retain Chandler to provide professional advice and optimal structuring of their portfolios and function as an extension of their staff through treasury management support. We are experts in public investing and provide excellent stewardship of the investment programs our clients entrust to us. Over our thirty-two-year history, Chandler has kept paramount the common investment objectives of local governments of safety of principal, liquidity, and above-benchmark returns over a market cycle. It is our view that there is no other firm with as targeted of a focus on public agencies and the dedication to the responsibilities and resources required to prudently manage their investment programs. Our risk management practices and relationship-based approach to investment management have led to our firm's solid growth, and we currently manage **over \$21 billion in firm assets** as of September 30, 2020. Our extensive resources include thirty-one professionals, of which eleven (11) are investment team members. We work closely with our clients to address specific investment objectives and risk tolerances as they relate to overall sound financial management, while maintaining the focus and discipline to help guide portfolios through challenging market cycles. Our size and resources enable us to provide our clients direct access to their portfolio management team daily and a level of communication and customer service that is reflected in our 90% client retention rate over the last five years.

***Firm History***

Chandler was founded in 1988 by Kay Chandler as a result of her experience serving as Investment Officer for over a decade for two large municipalities. Ms. Chandler recognized that public entities with limited time and resources could benefit from external professional expertise and technological resources to help manage their investment programs. In 1991, Marty Cassell, Ms. Chandler's successor on the investment staff of the City of San Diego, joined the firm. Mr. Cassell now serves as Chandler's CEO and Chief Investment Officer.

For over thirty-two years, the firm's Executive Team has skillfully assembled a team of professionals with the specialized expertise and technological skills necessary to structure highly effective, fixed income cash and core investment programs for municipalities and other government entities. The firm's Investment Team has developed proprietary tools and processes for structuring and managing high quality fixed income portfolios. All the firm's Portfolio Managers are CFA charter holders and are committed to strengthening and sharing their knowledge of prudent standards of investment management for public funds.

***Firm Structure and Ownership***

Chandler is a 100% independent and fully employee-owned corporation (*Source: Form ADV 6/15/2020, Item 12, Schedule A, #6 and #7*), with no other business affiliations, subsidiaries, or joint ventures. We do not have any competing lines of business such as financial advisory or banking, and we do not manage Local Government Investment Pools. We are not affiliated with a broker dealer. All of our client transactions are delivered directly to an independent custodian on a delivery versus payment basis. 100% of our resources are committed to management of our clients' portfolios. As a matter of policy and practice, Chandler does not engage in any soft dollar arrangements with broker-dealers or third parties.

The firm's ownership is structured as an Employee Stock Ownership Plan ("ESOP") that aligns with the firm's values and culture of shared success and ensures that the firm will remain employee-

owned and managed by a core executive team well into the future. Every employee is an owner through the ESOP Trust, which owns 35% of the firm. Key employees from the Executive Management Team remain as individual owners.

**b) Describe any potential conflicts of interest the firm may have in the management of this account.**

None. Chandler does not currently have, nor do we potentially foresee any conflicts of interest that could be perceived as affecting the objectivity of our advice in the management of the City's account. We commit to disclose any potential conflicts of interest, including those that could be seen as a beneficial relationship that would abuse our position of trust and responsibility, in the unlikely event that one arises.

Chandler will act as a fiduciary to the City, putting your interests ahead of our own and pledging to act only with the highest ethical standards in all of our investment management activities and dealings. Chandler's fiduciary obligations are detailed in the firm's comprehensive *Code of Ethics* manual that is adopted and demonstrated by the firm and all of its employees.

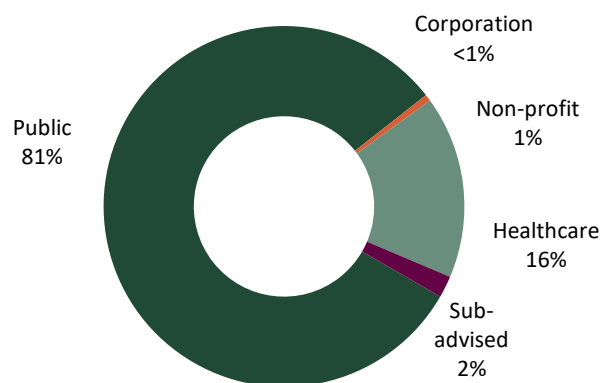
**c) Identify the types of accounts primarily managed by the firm.**

Chandler manages short- to intermediate-duration, high-quality fixed income securities for public entities and other risk-conscious institutional clients who seek investment programs that prioritize *safety of principal, appropriate liquidity, and optimized returns over a market cycle*. All of Chandler's public agency clients' funds are structured as separately managed accounts.

**Chandler Client Types and Total Firm Assets Under Management**  
*As of September 30, 2020*

Client Type	# of Accounts	AUM (\$MM)*
Public Agencies	299	\$17,137
Corporate	13	\$44
Healthcare	34	\$3,460
Non-profit	34	\$125
Sub-advised	697	\$412
Other	10	\$55
<b>Total</b>	<b>1,087</b>	<b>\$21,233</b>

\*Other includes DC Plan, Bank, Church and Higher Education assets. Chandler assets under management as of 9/30/2020.



We customize portfolios to comply with individual clients' investment directives for operating funds, debt service, capital improvement, and any other funds that may have specific constraints. Our clients include cities, counties, water and wastewater districts, transportation authorities, healthcare, higher education, school districts, insurance funds, foundations/endowments, not-for-profit organizations and corporations. We provide complete investment services and treasury management support for a public entity investment program, including:

- Customized strategies
- General Revenue Funds
- Bond Proceeds
- Capital Project Funds
- Debt Service Funds
- Reserve Funds
- Post-Employment Benefit Trusts/OPEB
- JPIA Investment Funds
- Separately managed portfolios
- Sharing fiduciary duty of our clients

Chandler manages portfolios that are comprised of asset classes in the U.S. fixed income universe that align with our clients' objectives of **safety, liquidity** and **return**. In Florida, these are assets that are permitted by Florida Statute 218.415, and include high quality, short-term investment-grade, U.S. dollar denominated securities including but not limited to *U.S. Treasuries, Federal Agencies, municipal bonds, negotiable CDs, Corporate notes, Supranational securities, asset-backed securities, mortgage-backed securities* and *commercial paper*.

- d) Describe any SEC, FINRA, NASD or any other regulatory censure or litigation during the past five years involving the firm and/or the individuals that will be providing investment services to the City.**

None. Neither Chandler nor any of its officers or employees have ever been subject to any censure or litigation by a regulatory agency including the SEC, FINRA, or NASD in its history.

- e) Summarize fidelity bond coverage, errors and omissions, employee dishonesty, fiduciary liability insurance, or other fiduciary coverage the firm carries.**

Chandler maintains a comprehensive, full-coverage insurance program with the relevant coverages provided by firms rated "Excellent" or better by AM Best Rating, including the following:

EO/DO (professional liability)	\$20 million (\$200,000 retention);
Fidelity Bond/Employee Dishonesty:	\$10 million/\$100,000 deductible;
Commercial General Liability:	\$2,000,000 per occurrence/\$4,000,000 aggregate;
Umbrella Liability:	\$10,000,000 per occurrence/\$10,000,000 aggregate;
Cybersecurity:	\$4,000,000;
Automobile Liability:	\$1,000,000 combined single limit.

- f) Clarify if the firm acts as a broker or as a primary dealer in securities or receives any other form of additional compensation (including soft-dollars) for client transactions aside from the direct fee paid by clients.**

Chandler does not act as a broker or dealer in securities or receive any other form of additional compensation from soft dollars, third party sales arrangements, investment pool management, or transaction fees. The firm's revenue is derived entirely from fees received from our clients for investment management and/or advisory services.

- g) In the past five years, has the manager or any of its related affiliates purchased a security on behalf of a client that eventually defaulted while still held in a client's portfolio? If so, please explain.**

We have never purchased a security for a client's account that has eventually defaulted while still held in a client's portfolio.

The investment management team continually conducts rigorous, multi-level credit analysis on bonds we consider for purchase on behalf of clients to assure they meet our high standards of credit quality. Chandler's disciplined security selection seeks to identify deteriorating credits, anticipate potential downgrades by the NRSROs, and sell credits that do not suit the risk characteristics of the overall portfolio. To accomplish this, all credits are monitored daily and are closely reviewed by our Credit Committee on at least a quarterly basis. Credits that are viewed as higher risk are reviewed more frequently. The Committee monitors the news on each issuer on our approved list daily (earnings releases, management presentations, ratings changes, etc.), and distributes this information to the entire Investment Management Team. If the Credit Committee determines that the fundamentals of the underlying credit will deteriorate to a level that is not

commensurate with the risk tolerance of the portfolio, the Credit Committee may act to sell the credit and/or remove the issuer from our approved credit list.

- h) Provide a copy of the firm's most recent ADV Part II, including Part I and Part II, as on file with the SEC.**

Chandler Asset Management is registered with the U.S. Securities and Exchange Commission under the Investment Adviser's Act of 1940. The firm acknowledges its fiduciary duty to its clients and makes investment recommendations as a "Prudent Expert". We have provided our most recently filed *Form ADV Parts 1 and 2* in the **Appendix** as part of our submission.

CRD Number	SEC Number
107287	801-44378

Chandler is registered with the State of Florida's *Division of Corporations* and listed as such on [sunbiz.com](http://sunbiz.com). We have provided our 2020 certificate of evidence of our active (good standing) status in **Appendix B**.

- i) Provide a SSAE 16, SOC 1, Type II Report at the time of selection, or within twelve months from the effective date of the contract. No substitute documentation will be acceptable.**

We do not hire a third party to complete a SOC1 audit. However, we do perform an annual compliance review of our policies and procedures internally in accordance with Rule 206(4)-7 of the Investment Advisers Act of 1940. As part of this review, we hire an independent compliance consultant to perform quarterly testing of key controls.

In addition to this independent testing of our own controls, we also rely on your third-party custodian bank to settle the investment transactions that we effect on your behalf. The selected third-party custodian will provide the SOC 1 report, prepared in accordance with *Statement on Standards for Attestation Engagements* (SSAE 18, formerly, SAS 70) on their internal controls to you.

Chandler is a registered investment adviser subject to the regulations set forth by the Securities and Exchange Commission (SEC). The SEC requires that our firm must have a compliance program that is reasonably designed to detect and prevent against violations of regulatory requirements. Our compliance program includes policies and procedures that address all aspects of our investment advisory operation, including our accounting systems, IT security and privacy controls.

If selected as your adviser, we will be pleased to make the results of this exam available to you.

### 2.3.6 TAB 4 – EXPERIENCE

- a) Describe the firm’s experience in managing investment portfolios for public funds and governmental entities, including any relevant experience managing public funds in Florida.

Chandler is distinguished by the fact that both our firm, and the individuals assigned to the City’s engagement have a long-standing commitment and proven record of performance in the public sector. Over our thirty-two-year history, Chandler has managed short duration fixed income portfolios for public agencies and kept paramount the common investment objectives of public agencies of **safety of principal, liquidity, and above-benchmark total returns** over a market cycle.

#### ***Three Decades of Experience investing Public Funds***

Chandler’s significant experience managing fixed income assets for state and local governments through a variety of economic conditions is reflected by the inception dates of the investment strategy composites commonly used by our public clients, and by the various interest rate environments (shown below) that Chandler has experienced since its inception. These are the same strategies we propose to use to manage the City’s funds.

Chandler Strategy	Inception Date
Ultra Short Bond (0-3 Year Strategy)	11/30/1988
Limited Maturity (1-3 Year Strategy)	9/30/1988
Short Term Bond (1-5 Year Strategy)	9/30/1995

**Two Year Treasury Yield History**  
*Since Inception of Chandler Asset Management*



Source: Bloomberg<sup>i</sup>

Our experience managing through volatile markets, including the most recent rising interest rate cycles and current pandemic, is critical to managing interest rate risk, preserving market value of principal and the liquidity to sell assets if necessary. In addition, our expertise in credit analysis is instrumental to our clients during credit crises, including the most recent market decline due to COVID-19 in March 2020, resulting in portfolios that generated competitive returns and experienced no loss of principal due to credit default during that time.

Our strategies have demonstrated a consistent history of protecting our client's principal, as measured by the number of quarters that the total return has been positive.

### Principal Preservation Over Multiple Market Cycles

*As of September 30, 2020*

Strategy:	# of Quarters	# Positive Quarters/ %	# Negative Consecutive Quarters	# Negative Years (total return)
<b>Ultra Short Bond (0-3 year)</b>	127	123 / 97%	0	0
<b>Limited Maturity (1-3 year)</b>	128	115 / 90%	2	0
<b>Short Term Bond (1-5 year)</b>	100	86 / 86%	2	0

*Based on Chandler's Ultra Short Term Bond, Limited Maturity, and Short Term Bond composites as of 9/30/2020. Past performance is not indicative of future results. Please see GIPS Composite Reports for complete details. For one-on-one presentation only.*

Throughout their careers, the team assigned to the City's engagement has provided investment advice, management, strategy, reporting, banking and treasury management analysis, cash flow analysis, client education, and custodial services review for over 36 Florida public agencies. These client accounts have included operating cash and reserves, bond project funds, bond reserves, capital improvement funds, core funds and other non-operating funds, each separately managed to fulfill its specific objectives within its own risk profile.

A representative list of current public agency clients we serve nationwide is provided below. The names in bold denote relationships managed by Chandler's Florida team:

### Chandler's Representative List of Public Agency Clients

Cities		
Agoura Hills, CA American Canyon, CA Arcata, CA Brea, CA Buena Park, CA Breckenridge, CO Camarillo, CA Corona, CA Danville, CA <b>Deltona, FL</b> Dublin, CA Imperial Beach, CA Louisville, CO	La Habra, CA La Mirada, CA <b>Leesburg, FL</b> Long Beach, CA <b>Longboat Key, FL</b> Menifee, CA Merced, CA Mission Viejo, CA Monterey, CA Moreno Valley, CA National City, CA Newport Beach, CA Parker, CO	Pittsburg, CA San Clemente, CA San Jacinto, CA San Leandro, CA San Luis Obispo, CA San Marcos, CA San Juan Capistrano, CA So. San Francisco, CA Sunnyvale, CA Tracy, CA Truckee, CA Westminster, CA Westminster, CO
Counties and States		
<b>Buncombe, NC</b> Dakota, MN	State of Delaware City & County of Denver, CO	<b>Gwinnett, GA</b> Pitkin, CO



**Special Districts and Other Entities**

Alameda Corridor Trans. Authority, CA Authority for CA Cities Excess Liability, CA California Earthquake Authority California Insurance Pool Authority, CA California Joint Powers RMA, CA Colorado Springs Utilities, CO CSAC Excess Insurance Authority, CA Donala Water and Sanitation District, CO Eagle River Water & Sanitation District, CO Elsinore Valley Municipal Water District, CA E-470 Public Highway Authority, CO <b>Florida Polytechnic University, FL</b> Fontana POA Retiree Benefit Trust, CA Los Angeles Co. Metro. Trans. Authority, CA Maricopa County Community College Dist., AZ Moulton Niguel Water District, CA Orange County Sanitation District, CA	Orange County Transportation Authority, CA Rancho California Water District, CA Redwood Empire Muni. Insurance Fund, CA <b>Reedy Creek Improvement District, FL</b> San Bernardino Municipal Water District, CA San Diego County Regional Airport Authority, CA San Diego County Water Authority, CA South Metro Fire Rescue Authority, CO <b>Tampa Bay Water, FL</b> Three Valleys Municipal Water District, CA Transportation Corridor Agencies, CA Vallecitos Water District, CA Walnut Valley Water District, CA WestEd, CA Western Municipal Water District, CA Whittier Area Schools Ins. Authority, CA Yolo County Public Agency RMIA, CA
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*\*A representative listing of the firm's public agency clients, shown in alphabetical order. This list includes only clients that have given permission to be listed. Includes discretionary and non-discretionary relationships. It is not known whether the listed clients approve or disapprove of Chandler Asset Management or the services provided.*

**Chandler's Ten Largest Public Agency Clients**

Client	AUM (\$ millions)	Managed Since
Transportation Corridor Agencies, CA	\$1,316	2014
PRISM (formerly CSAC Excess Insurance Auth.), CA	\$883	2015
Orange County Sanitation District, CA	\$754	2014
City of Sunnyvale, CA	\$641	2018
California Wildfire Fund	\$634	2019
State of Delaware	\$530	2013
City of Tacoma, WA	\$524	2015
City of Long Beach, CA	\$479	2009
City of Riverside, CA	\$461	2019
San Diego County Regional Airport Authority, CA	\$413	2018

*\*Chandler's largest clients based on assets under management as of 9/30/2020. Includes discretionary and non-discretionary relationships. The list only includes clients that have given permission to be listed, but it is not known whether the clients listed approve or disapprove of Chandler Asset Management and the advisory services provided.*

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***Case Study for Current Florida Municipal Client<sup>1</sup>:******Town of Longboat Key, Florida – Client since 2016***

In 2016, through a competitive RFP process followed by firm interviews, Chandler was selected by the *Town of Longboat Key* to replace the Town's incumbent manager and serve as investment adviser for operating funds, capital improvement funds, and debt service reserve funds. We began the engagement with multiple in-person meetings with Town staff to fully understand the current investment process, existing/legacy investment strategies, and challenges that exist for the Town and staff. Several key needs were identified: 1) Assistance with the Town's current banking relationship and investment recommendations for the Town's required liquidity, 2) Structuring the portfolio within their Investment Advisory committee's recommendations and 3) Comprehensive, timely reporting that incorporated balances in LGIPs, internally managed funds and the externally managed portfolio.

We assisted the Town with a banking services RFP that reduced banking costs by over 20% and increased available cash reserves by over \$20 million. We provided staff and the Town's Investment committee with a review and recommendations of available LGIPs in Florida. Since inception of the relationship, we have actively participated in monthly calls with Staff as well as quarterly portfolio review meetings with the Town's Investment Committee. We have provided regular economic and portfolio strategy updates, as well as periodic accounting education for the Committee, cash flow analysis, expected earnings forecasts, and recommendations for proceeds of bonds for infrastructure improvements. The quarterly portfolio review meetings have provided a forum for investment committee members to express, and for our portfolio manager(s) to address, their preferences for diversification of the portfolio and selection of corporate issuers subject to their comfort level. Staff and investment committee members appreciate the direct communication with the portfolio management team, responsive communication, timely access to accounting, transaction and portfolio reports through our online portal, and monthly compliance monitoring.

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The solid growth of our public client base is further evidenced by clients who have recently transitioned to Chandler's management either from internal management or from their former provider of services through competitive RFP processes in the second half of 2019. These clients include ***Reedy Creek Improvement District (FL), Buncombe County (Asheville, NC), and Gwinnett County (Atlanta, GA)***<sup>2</sup>. We encourage you to contact any of our clients. They can attest to the factors that led them to select Chandler and the success of their transition to Chandler. We propose to manage the City's portfolios in a manner that is customized to meet the specific financial and investment goals of the City and would provide you with the same level of diligence, client service and investment expertise that we provide to all our clients.

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<sup>1</sup> *\*Individual case studies represent actual outcomes related to our services. Approval or disapproval of Chandler Asset Management, Inc.'s services should be verified with each agency listed.*

<sup>2</sup> *This list includes clients who have given permission to list. It is not known whether the clients approve or disapprove of Chandler Asset Management and the investment management/advisory services provided.*

- b) Provide a list of three Florida public client references for which your firm provides manages public funds. Include client name, contact information, services provided, value of assets managed, and length of time managing their assets.

Chandler is pleased to provide the following current client references for the City of Hollywood:

**Chandler Current Client References**

Client	Contact Information	Dates of Service	AUM*	Services Provided
<b>City of Deltona</b> 2345 Providence Boulevard Deltona, Florida 32725	Camille Hooper <i>Finance Director</i> Ph: (386) 878-8553 <a href="mailto:chooper@deltonafl.gov">chooper@deltonafl.gov</a>	2015-present	\$24 M	Management of operating funds in 1-3 strategy; consolidated reports to include internally managed assets.
<b>City of Leesburg</b> 501 West Meadow Street Leesburg, Florida 34748	James Williams <i>Finance Director</i> Ph: (352) 728-9715 <a href="mailto:James.williams@leesburgflorida.gov">James.williams@leesburgflorida.gov</a>	2014-present	\$44 M	Management of operating funds in 0-3 year and 1-3 year strategies; consolidated reports; oversight of LGIP assets.
<b>Town of Longboat Key</b> 501 Bay Isles Road Longboat Key, Florida 34228	Susan Smith <i>Finance Director</i> Ph: (941) 316-6882 <a href="mailto:ssmith@longboatkey.org">ssmith@longboatkey.org</a>	2016-present	\$36 M	Management of operating funds in 1-3 year strategy; consolidated reporting; assisted with banking RFP; oversight of LGIP assets.
<b>Tampa Bay Water</b> 2575 Enterprise Road Clearwater, Florida 33763	Sandro Svrclin <i>Finance Manager</i> Ph: (727) 791-2306 <a href="mailto:ssvrclin@tampabaywater.org">ssvrclin@tampabaywater.org</a>	2016-present	\$134 M	Management of operating funds in 0-2 year and 1-3 year strategies.

\*Chandler Asset Management Assets Under Management as of 9/30/2020. This list includes clients who have given permission to list. It is not known whether the clients approve or disapprove of Chandler Asset Management and the investment management/advisory services provided.

- c) Summarize the assets under your management (public funds only) over the past five years by the following categories: short-term (less than one year), medium term (one to three years) and long term (one to five years) and bond proceed funds. Also please separate these asset totals by government institutions and other institutions.

**Chandler Institutional Assets Under Management**  
*Previous Five Years (2015 – September 2020)*  
 In \$ millions

	Short-term operating funds		Medium-term operating funds		Long-term operating funds		Bond Proceed Funds	
	<u>Gov</u>	<u>Other</u>	<u>Gov</u>	<u>Other</u>	<u>Gov</u>	<u>Other</u>	<u>Gov</u>	<u>Other</u>
<b>2020 YTD</b>	\$1,470	\$38	\$6,654	\$112	\$8,610	\$3,494	\$367	\$41
<b>2019</b>	\$1,461	\$47	\$6,076	\$118	\$7,527	\$3,352	\$562	\$40
<b>2018</b>	\$1,629	\$113	\$4,989	\$130	\$6,194	\$2,713	\$388	\$39
<b>2017</b>	\$1,190	\$63	\$3,598	\$123	\$5,487	\$2,589	\$309	\$40
<b>2016</b>	\$994	\$70	\$3,299	\$104	\$5,629	\$2,225	\$253	\$0
<b>2015</b>	\$877	\$131	\$3,332	\$88	\$4,743	\$1,924	\$298	\$13

*Chandler's institutional assets under management over the past five years plus the current year as of 9/30/2020. Short-term funds are <1 year, Medium-term funds are 0-3 years, Long-term funds are 1-5 years as well as equity and multi-asset strategy funds.*

- d) Describe the firm's experience in developing investment policies and portfolio management guidelines for government funds.

We are experts in Florida Statutes and best practices for public agencies in Florida and nationally. Through our active involvement on advisory committees that develop recommended best practices, we have assisted associations develop guidelines for the effective writing and revising of prudent investment policies. We review and revise our clients' investment policies at the onset of each engagement to ensure they encapsulate state legal requirements and best industry practices set forth by the GFOA and the Association of Public Treasurers (APT) and can assist your staff with a complete review and possible revision, consistent with your preferences and prioritized management items.

Our policy reviews will conform to:

- Florida Statutes 218.415
- Specific City directives
- Chandler's Best Practices
- Industry best practices as identified by the Government Finance Officers' Association and the Association of Public Treasurers of the United States and Canada.

We will conduct an extensive review of your Investment Policy, as well as consult with you to understand and quantify your investment objectives, risk profile, and expected outcomes. We will have ongoing discussions as needed to ensure that the investment strategy and allocation of funds to diversified fixed income sectors remains consistent with your understood goals and objectives. We will regularly consult with your staff on ways to expand investment guidelines with the intent to ensure they are exposed to the broadest opportunity set, while still focusing on the primary objectives of safety of principal and access to cash. Once the investment policy is approved, it becomes the operating guideline for the portfolio. In addition, we will perform a formal review of the City's investment policy annually to ensure that it is updated to reflect the latest changes to Florida State Statutes, as well as incorporate your objectives and cash flow needs

that may change over time. Recommendations are meant to incorporate best practices that *provide clarification, increase return potential, and improve risk management.*



### 2.3.7 TAB 5 –PERSONNEL

- a) Identify key members of the firm's team that will service the City, including investment professionals, analytical investment and research staff, other decision-making support and back office staff. Identify the primary contact and describe the roles of each key person.

Our proposed engagement team for the City is comprised of tenured investment and client service professional who average over two decades of experience working with public agencies in Florida. Throughout their careers, **Scott Prickett, CTP**, *Deputy Chief Investment Officer*, **Julie Hughes**, *Senior Portfolio Strategist*, **Mel Hamilton**, *Senior Relationship Manager*, and **Stacey Alderson, CTP**, *Senior Client Service Manager* have provided investment advice, management, strategy, reporting, banking and treasury management analysis, cash flow analysis, client education, and custodial services review for over 50 Florida public agencies with over \$5 billion in assets. Client accounts include operating cash and reserves, bond project funds, bond reserves, capital improvement funds, core funds and other non -operating funds, each separately managed to fulfill specific objectives within its own risk profile. Our team provides a personalized approach to relationship management and direct contact with the portfolio management team to ensure that the City's funds are prudently managed. In addition, our culture of compliance and the transparency offered through comprehensive reporting will keep the City's staff and Council aware of all aspects of its portfolio.

The key professionals who will work with the City are listed in the following table.

**Chandler Professionals for the City of Hollywood**

Contact Name, Title	Responsibilities to the City	Industry Tenure	Firm Tenure	Education
<b>Scott Prickett, CTP</b> <i>Deputy Chief Investment Officer</i>	<ul style="list-style-type: none"> <li>• <b>Portfolio Strategist</b></li> <li>• <b>Investment Contact</b></li> <li>• Implements portfolio strategies</li> <li>• Monitors alignment with client objectives and policies</li> <li>• Co-Chair of <i>Economic and Market Analysis Committee</i></li> </ul>	33 years	6 years	B.S. Business Administration, Finance, University of Northern Colorado; CTP designation
<b>Julie Hughes</b> <i>Senior Portfolio Strategist</i>	<ul style="list-style-type: none"> <li>• <b>Portfolio Strategist</b></li> <li>• <b>Investment Contact</b></li> <li>• Implements portfolio strategies</li> <li>• Monitors alignment with client objectives and policies</li> <li>• Member of <i>Quantitative Analysis Committee</i></li> </ul>	27 years	6 years	BBA, Marketing, University of Texas at Austin; MBA, Wharton School of the University of Pennsylvania
<b>Mel Hamilton</b> <i>Senior Relationship Manager</i>	<ul style="list-style-type: none"> <li>• <b>Primary Client Contact</b></li> <li>• Located in Orlando, FL</li> <li>• Conducts onboarding process</li> <li>• Schedules training and educational presentations</li> <li>• Facilitates and attends in-person meetings</li> </ul>	29 years	6 years	B.S. Business Administration, University of Virginia

	<ul style="list-style-type: none"> <li>Oversees client communication</li> </ul>			
<b>William Dennehy II, CFA</b> <i>Deputy Chief Investment Officer</i>	<ul style="list-style-type: none"> <li><b>Portfolio Manager</b></li> <li>Implements portfolio strategies</li> <li>Research and Analysis</li> <li>Co-Chair of <i>Economic and Market Analysis Committee</i> and <i>Credit Committee</i></li> </ul>	28 years	9 years	B.S. Business Administration, California State University, Chico; CFA® charter holder
<b>Stacey Alderson, CTP</b> <i>Senior Client Service Manager</i>	<ul style="list-style-type: none"> <li><b>Client Service Manager</b></li> <li>Facilitates reporting and client meetings</li> <li>Conducts onboarding process</li> <li>Schedules training and presentations</li> </ul>	22 years	6 years	B.A. Business Administration, Accounting, University of Montevallo; CTP designation
<b>Nicole Dragoo, JD, IACCP</b> <i>CCO, Chief Compliance Officer</i>	<ul style="list-style-type: none"> <li><b>Head of Operations and Compliance</b></li> <li>Responsible for regulatory compliance and legal matters</li> <li>Directly manages investment operations</li> <li>Oversees firm's administrative functions</li> </ul>	20 years	19 years	B.A. Business Economics, J.D. University of San Diego; Investment Adviser Certified Compliance Professional (IACCP) designation

The investment professionals assigned to the City of Hollywood have an average of 28 years of experience serving public agencies and have worked with public agencies in Florida since 2007. As key members of Chandler's Investment Management Team, **Scott Prickett, CTP**, *Deputy Chief Investment Officer* and **Julie Hughes**, *Senior Portfolio Strategist*, will be the City's primary investment contacts, each having over a decade of experience investing public funds in Florida. Scott and Julie have advisory responsibilities that include monitoring the investment strategies for alignment with client objectives, reviewing and revising investment policies, adequately addressing anticipated cash flow needs, and providing research and education. **Stacey Alderson, CTP** provides client service, including accounting, reporting, and training during the onboarding process. Scott and Stacey's work in earning the Certified Treasury Professional designation give them a unique perspective on investment structures specific to treasury management functions within the public agency world.

Throughout their careers, the team assigned to the City's engagement has provided investment advice, management, strategy, reporting, banking and treasury management analysis, cash flow analysis, client education, and custodial services review for over 50 Florida public agencies with over \$5 billion in assets. These client accounts have included operating cash and reserves, bond project accounts, bond reserves, capital improvement funds, core funds and other non-operating funds, each separately managed to fulfill its specific objectives within its own risk profile.

**William Dennehy II, CFA**, *Deputy Chief Investment Officer*, is the City's assigned portfolio manager and is responsible for conducting research on securities, implementing the portfolio's strategy in a customized manner, and executing securities transactions in the accounts. Bill serves as Co-Chair of the firm's *Economic and Market Analysis Committee* and *Credit Committee* and serves on

additional committees that shape the firm's outlook for asset allocation, proprietary models, and both quantitative and qualitative analysis and decision-making.

**Mel Hamilton**, *Senior Relationship Manager* will be the primary client contact and has worked with public agencies in Florida since 1990. From 1990 – 2012, Mel Hamilton provided investment advisory services to public entities in Florida through his roles as Managing Director for SunTrust Banks Capital Markets (1990-2008) and as Senior Managing Consultant with PFM Asset Management (2008-2012). Mel has a significant understanding of public agencies' needs for portfolio management, cash flow requirements, and reporting and will coordinate services and ensure organizational efficiencies. In addition to the City's investment contacts, Mel will work closely with the City to support communications and ensure that reporting and deliverables fulfill your needs. Located in the Orlando area, Mel will be available to your staff as a local resource and for in-person meetings.

Our professionals are active in organizations relevant to Florida public fund investment best practices, including the Government Finance Officers Association (GFOA) and the Florida Government Finance Officers Association (FGFOA). Pursuant to the firm's team approach, the City's investment and client service contacts are supported by additional investment professionals who average over twenty-one (21) years of industry and public agency experience.

The firm's COO and Chief Compliance Officer, **Nicole Dragoo, JD, IACCP**, oversees Chandler's compliance and operations functions. She also leads the onboarding process of new client accounts and heads a team that communicates effectively with accountants, custodians and administrators during the transition period and for the duration of the relationship.

All of the above professionals are supported by Chandler's *Investment Management, Client Service, Marketing, and Operations Teams* in ensuring the robustness of our service delivery. The firm's CEO and Chief Investment Officer, **Martin Cassell, CFA** provides oversight of all aspects of the firm, leads the investment team and implementation process of our proprietary quantitative models and strategy.

- b) Provide resumes for all key investment professionals who will be directly responsible for the investment of the City's funds, including title, role, number of years with the firm, number of years experience, professional designations or licenses, and any other accomplishments or accolades.**

For further details on the investment, client service, and compliance professionals who are key to the City's engagement, please see Chandler's *Professional Biographies* in the **Appendix**.

- c) State office location (city and state) for key members of the firm's team that will service the City.**

The engagement for the City will be managed from Chandler's Florida office located in the Orlando area. The City's relationship manager, Mel Hamilton, will be the primary client contact for daily service needs and will be a local resource for your staff. Chandler's Florida office was established in 2014 and serves the firm's clients in the state as well as throughout the Southeast. The City's engagement team includes Scott Prickett, *Deputy Chief Investment Officer* and Julie Hughes, *Senior Portfolio Strategist*. Collectively, the team has worked with Florida public agencies since 1990 and averages 28 years of public funds experience.

**Chandler's Florida Office**  
801 International Parkway, Suite 500  
Lake Mary, Florida 32746  
Direct: (407) 902-4695

**Chandler's Corporate Headquarters**  
6225 Lusk Boulevard  
San Diego, California 92121  
Direct: (858) 546-3737 | Toll Free: (800) 317-4747

- d) **Provide license number and State of licensure (if any) for key members of the firm's team including registration with the SEC, and registration with the Florida Office of Financial Regulation, as applicable.**

In addition to the firm's registered investment adviser status with the Securities Exchange Commission, the below members of Chandler's Investment Management Team are registered representatives with the SEC.

Chandler Investment Adviser Representative	CRD Number	Effective date
Martin D. Cassell, CFA	4330905	4/23/2003
Kay Chandler, CFA	2276868	8/11/1993
Jayson Schmitt, CFA	4892847	8/3/2005
Scott D. Prickett, CTP	1901448	5/1/2014
William Dennehy, CFA	2397527	4/14/2011
Julie K. Hughes	5397196	5/2/2014
Carlos Oblites	5350645	9/11/2017
Christopher McCarry	4472441	7/25/2013
Ted J. Piorkowski, CFA	1857510	4/15/2003
Genevieve C. Lynkiewicz, CFA	4462193	10/19/2015
Shelly L. Henbest, CFA	4829437	4/23/2010

Chandler's professional team has both the expertise and required licenses to perform each of the required duties specified in this proposal. We maintain the resources and personnel to seamlessly transition the City's investment program to Chandler's management, which we would begin immediately and without hesitation. The assigned engagement team would provide uninterrupted and continuous service for the duration of the contract. Furthermore, we believe that the business information, investment management process, and experience of our tenured team confirms that we exceed the requirements stated in *Section 2.1.4 Minimum Criteria* as well as in its *Scope of Work* that the City has for its lead investment manager and other assigned engagement team members.

For additional information on the above professionals, please see the *Professional Biographies* included in the **Appendix**.

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**2.3.8 TAB 6 – INVESTMENT MANAGEMENT APPROACH AND DISCIPLINE****a) Briefly describe your firm's investment management philosophy.**

We believe that through effective risk management, we can enhance the potential for higher **total returns** for risk-conscious clients, while maintaining their shared primary objectives of **safety** and **liquidity**. Our approach utilizes investment processes and strategies we have developed over 30 years, and focuses on:

- Safety of principal<sup>3</sup>;
- Appropriate levels of liquidity;
- Diversification of risk;
- Compliance with policies, legal requirements, and risk/return objectives; and
- Active management to generate investment income and total return.

We implement this philosophy by structuring investment portfolios with the goal of achieving performance that consistently exceeds the returns of a selected market benchmark, while maintaining each client's risk profile at all times. We reduce exposure to credit risk and market risk by diversifying the portfolio across all security classes permitted by policy and by Florida Statutes, diversifying the portfolio by issuer and security type, and by establishing and maintaining a target portfolio duration that is consistent with each client's risk profile and investment objectives. Chandler's singular focus stems from the conservative investment philosophy of our clients that prioritizes safety and liquidity above chasing returns that may put their principal at increased risk.

As a result of this focus, we take a conservative approach regarding all aspects of the investment and portfolio management process. Our methods for developing the investment objectives and constraints for the City is customized after an extensive review and thorough understanding of both the investment policy, risk tolerances, as well as the current and expected mandates of the City's staff and stakeholders. We will begin our relationship with the City by understanding staff's concerns and preferences. Through multiple in-person (or virtual) meetings we aim to fully understand the City's current investment process and challenges that exist for the City and staff. Following a thorough understanding on the City's goals and objectives for each pool of funds, we will begin with detailed reviews of the current investment portfolios to gain an understanding of cash flow needs, risk tolerances, permitted securities, credit profile, duration targets, and current maturity structure. We would confirm that the Investment Policy continues to provide for the City's primary objectives of safety, liquidity, and return, and incorporates the latest revisions to Florida Statutes. Chandler will work with the City to develop investment strategies that are tailored to meet your exact goals and objectives. Strategy discussions will occur after we have a complete understanding of the City's unique liquidity requirements and risk tolerance levels. We will then review the historical returns of strategies that are in alignment with the City's investment objectives.

***Transition to Chandler's Care***

The Investment professionals working with the City will present characteristics of Chandler's investment strategies and securities available for purchase that are consistent with the City's investment policy. Chandler manages portfolios that are comprised of asset classes in the U.S. fixed income universe that align with our clients' objectives of **safety, liquidity** and **return**. Our investment professionals will also present a benchmark study that analyzes the risk/return

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<sup>3</sup> While our conservative investment approach promotes safety, investing in securities carries varying degrees of risk and we cannot guarantee safety of principal.



characteristics of benchmarks to consider for performance measurement that will align with the City's tolerance for risk. The result of these discussions will be a Management Directive governing the investment of funds as well as additional services that may be required to support staff and treasury management operations. The Management Directive will also include a mutually agreed on transition plan for any rebalancing of the current portfolios.

Over the last three years, Chandler has completed almost fifty transitions of local government and other public agency investment programs into our care. Many of these clients include those who have transitioned to Chandler from another provider due to a competitive RFP process, and others are clients who had never sought external oversight of their investment programs. Chandler has significant expertise in seamlessly implementing both cash and existing securities into our investment advisory, compliance and reporting systems.

The key tasks that can be expected during the engagement with Chandler are as follows:

***Key Engagement Tasks***

Task	Responsible Chandler Staff	Frequency
<b>1. Conduct Kick-off Meeting</b>	Scott Prickett, Julie Hughes, Mel Hamilton	At inception
<b>2. Investment Policy review</b>	Scott Prickett, Julie Hughes	At inception; Annually thereafter
<b>3. Bond Indenture review</b>	Scott Prickett, Julie Hughes	At inception/As needed
<b>4. Cash flow analysis</b>	Scott Prickett, Julie Hughes	At inception/ongoing
<b>5. Establish benchmarks/strategies</b>	Scott Prickett, Julie Hughes	At inception
<b>6. Invest initial funds</b>	Portfolio Managers	At inception
<b>7. Conduct investment research</b>	Portfolio Managers	Ongoing (weekly)
<b>8. Reinvest funds</b>	Portfolio Managers	Ongoing (as needed)
<b>9. Review compliance</b>	Compliance Team/ Portfolio Managers	Daily
<b>10. Provide monthly reports</b>	Operations/Client Service Team	Monthly (by 3 <sup>rd</sup> business day)
<b>11. Provide quarterly reports</b>	Operations/Client Service Team	Quarterly (by 20 <sup>th</sup> business day)
<b>12. In-person presentations</b>	Scott Prickett, Julie Hughes, Mel Hamilton	Quarterly/as needed
<b>13. Financial analysis of gains/losses</b>	PM Team	Monthly/as needed
<b>14. Review cash flow forecasts</b>	Scott Prickett, Julie Hughes	Ongoing
<b>15. Ad hoc educational presentations</b>	Scott Prickett, Julie Hughes, Mel Hamilton	As needed
<b>16. Maintain proactive communication</b>	Entire Chandler Staff	Daily
<b>17. Other tasks</b>	City Staff/Chandler Team	As needed

If we are awarded the mandate to serve as the City's adviser, a transition Team will be assigned at the onset of the engagement. The City's assigned Engagement Manager, Mel Hamilton and Chandler's Client Service Team will work closely with your staff to guide the onboarding process to ensure a seamless transition. The following outline describes the plan we propose to transition a client's investment program into Chandler's management. While this table details the tasks and milestones involved in establishing a new relationship, we work with clients individually to accommodate any specific areas of concern to ensure a successful transition.

### Typical Implementation Timeline

<b>Establish the Account (1-2 Weeks)</b>
<ul style="list-style-type: none"> <li>• Final version of investment management agreement</li> <li>• Custodian notification (or selection)</li> <li>• Kickoff meeting scheduled</li> <li>• Policy review notes/discussion with the City</li> </ul>
<b>Kick-off Meeting (1-2 Weeks)</b>
<ul style="list-style-type: none"> <li>• Decisions about policy and portfolio made</li> <li>• Prioritized management/advisory topics and projects</li> <li>• Executed investment management agreement</li> <li>• Written documentation of all decisions (management directive)</li> </ul>
<b>Review Investment Recommendations and Reporting (1-2 Weeks)</b>
<ul style="list-style-type: none"> <li>• Investment Management Team presents detailed investment plan for investing of assets, including:               <ul style="list-style-type: none"> <li>○ Proposed portfolio characteristics</li> <li>○ Benchmarks for performance comparisons</li> <li>○ Securities selected (but not yet purchased) for the portfolio</li> </ul> </li> <li>• First report from Chandler's accounting and reporting system reconciled to custodian records</li> </ul>
<b>Investment of Funds (2-4 Weeks)</b>
<ul style="list-style-type: none"> <li>• The City approves investment plan</li> <li>• City's staff has access to <i>Chandler's Client Portal</i></li> <li>• Chandler prepares proposed timeline to complete all purchases</li> <li>• Funds fully invested to target portfolio structure</li> </ul>
<b>Ongoing Communication</b>
<ul style="list-style-type: none"> <li>• The City receives monthly statement by 3<sup>rd</sup> business day</li> <li>• The City receives quarterly investment report for discussion with Chandler team</li> <li>• Contacts chosen by the City receive weekly and monthly market updates</li> <li>• Chandler meets regularly in person to discuss portfolio, market and interest rate movement, cash flow requirements, proposed strategies, and performance.</li> </ul>

The team at Chandler is adept at keeping to a timely schedule of deliverables, ensuring a continuous and productive flow, as well as assisting clients with every step of the process.

**b) Describe the firm's approach in developing investment policies and portfolio management guidelines for government operating funds.**

We have provided our response to our approach in developing investment policies in Tab 4, Experience, above.

**c) What are the primary strategies utilized by the firm for adding value to portfolios (e.g. market timing, credit research, etc.)?**

The goal at Chandler is to deliver consistent, stable, risk-adjusted returns over a market cycle across all possible investing environments. Our approach to structuring the portfolios is designed to fulfill the City's requirements in a way that addresses specific investment needs, and focuses on the following key elements to provide safety, liquidity, and total returns over a market cycle:

**Duration Management.** We strive to maintain duration (the portfolio's price sensitivity to changes in interest rates) within a defined range that reflects the City's return requirements and acceptable volatility as indicated by a benchmark that reflects the risk parameters and expected return. Duration is the largest determinant of risk and return. We attempt to minimize the impact of the duration decision on return volatility by limiting duration to within a +/- 20% duration band around the target (benchmark) duration. We have observed that longer-duration portfolios have historically outperformed shorter duration portfolios over long-term investment horizons. The proper exposure to interest rate risk in a given portfolio must be a long-term decision based on specific portfolio objectives. The duration decision must balance the need for higher returns with the investor's requirements for cash flow and level of tolerance for risk, with duration allowed to vary within a narrow range over a full market cycle. We will work with the City to identify an appropriate duration target that takes advantage of longer maturity investments with higher yields, while limiting volatility and providing for needed liquidity.

**Sector Allocation.** Our sector allocation process is based on the belief that portfolios are more robust and prepared for unforeseen events if they have a well-diversified exposure to high quality fixed income securities. Our objective is to increase total return and reduce risk by overweighting the best value sectors that are acceptable for the portfolio and underweighting those sectors with less value. Using the output of the Sector Committee, we will determine the allocation to asset classes that we believe will provide the best economic opportunities as well as protection for the portfolio. If permitted by the individual client, we will also include sectors that are not represented in the benchmark index. We are able to add considerable value through rotating sectors as market conditions evolve and our outlook changes, thus identifying best relative value at time of purchase in order to capitalize on current market opportunities.

**Optimal Duration Structure (Term Structure).** Portfolio duration structure, or yield curve positioning, contributes to the value added to the portfolio by our process. Utilizing the output from the Economic and Market Analysis Committee in conjunction with the *Horizon Analysis Model*, the term structure for the portfolio is determined with the objective of finding a structure that prioritizes the protection of the portfolio and performs well under both anticipated and unanticipated yield curve shifts over a six-month horizon. The portfolio may have a "laddered" structure, with equal allocations across permitted maturities; a "barbell" structure, with maturities concentrated in very short and very long (for the individual portfolio) maturities; a "bullet" structure, with maturities concentrated around the target duration; or some combination of all three. As interest rates evolve, the Chandler team would alter the duration distribution of the portfolio based on the prevailing market conditions.

**Security/Issuer Selection.** Once the team has determined the percentage of the portfolio in any duration range or security type, individual securities are purchased to complete the portfolio structure. Chandler's investment team closely follows trends in the new issue market to take advantage of the cyclical swings in issuance in order to obtain attractive spreads over the risk-free Treasury rate. The seasoned professionals at Chandler are also well versed in the technical differences between various names in the investment universe, and frequently adjust the underlying name and sector exposure to take advantage of market anomalies only a skilled investor can consistently identify. Securities are subjected to a rigorous review process, including fundamental credit analysis, as well as quantitative analysis using proprietary tools. Our investment professionals recommend securities from an *Approved Issuer List* based on relative value considerations. In addition, our *Credit Committee* seeks to identify both improving and deteriorating credits so we can work to reposition client portfolios by seeking favorable and avoiding detrimental factors not yet understood by the majority of market participants. Analyzing

the credit worthiness of individual issuers to enhance portfolio yields while minimizing exposure to credit and downgrade risk is a key element in mitigating risk and adding value in our clients' portfolios.

**Active Management of Individual Securities** - To maintain the optimal structure in the portfolio, support the primary objective of safety of principal, as well as pursue compelling risk-adjusted returns over a market cycle, Chandler utilizes active management of the investment portfolio. With this approach, a security may be sold or replaced prior to maturity to take advantage of market conditions, generate liquidity, mitigate risk, or to enhance the return of the portfolio. We are also able to take advantage of the repricing into the current higher interest rate environment. The net economic benefit to the City is the sole consideration for purchasing/swapping/selling securities for the portfolio.

**Competitive Execution.** We recognize our duty to provide value to our clients and ensure the quality of our services as a fiduciary. We provide our clients with efficiencies in trading costs by broadening the network of broker-dealers that are utilized when we execute trades. Chandler currently has forty-nine (49) broker/dealers on its approved list. The City's staff is assured that through Chandler's best execution practices, it is receiving competitive, institutional pricing on transactions, as the firm seeks a minimum of three quotes per trade. The practice of competitively bidding for transactions results in an incremental net financial advantage for our clients over time and is an additional source of value in retaining Chandler as investment manager. This competitive process is viewable daily via trade tickets on the *Chandler Client Portal*.

**d) Describe the firm's training and education efforts to keep portfolio managers informed of developments relevant to the management of local government funds.**

We ensure portfolio managers are trained and up to date on changes to the financial markets as well as evolving practices that impact our local government clients. Many of our investment professionals have demonstrated their understanding of and commitment to portfolio management by earning industry credentials, such as the Chartered Financial Analyst (CFA) the Certified Treasury Professionals (CTP), and a number of FINRA licenses which require continuing education. Other team members are working to achieve these designations, and all employees are encouraged and supported to achieve these and other industry certifications or training that will assist them in their careers and ensure our clients have access to best in class professionals.

Chandler is deeply involved with the GFOA. Our investment professionals as well as members of our compliance and operations teams are guided by the GFOA's publications and best practices regarding investment management, compliance, and GASB reporting for public agencies. Our investment and client service professionals serve as committee members and are active participants, sponsors, and speakers at national and regional associations that develop recommended best practices and training curricula. In Florida, Chandler's investment professionals are involved with the Florida GFOA, and stay abreast of all legislative and regulatory issues that affect our clients in the State. In addition, professionals conduct due diligence on Local Government Investment Pools such as Florida PRIME, and are knowledgeable about yields available through pools and overnight liquidity vehicles in the best interest of our public clients as a fiduciary.

Our compliance professionals monitor regulatory changes affecting local governments and stay up to date on SEC updates and legislative changes. **Nicole Dragoo, JD, IACCP**, *Chief Compliance Officer* is an NRS Investment Adviser Certified Compliance Professional (IACCP) and ensures the firm is prepared to address the ever-changing rules, regulations, best practices, and new trends of financial industry compliance through additional and ongoing education. In addition, the firm

engages an outside consultant to assist us with the complex practice of regulatory compliance as it applies to varied aspects in the management of public funds.

***Education on Best Investment Practices for Florida Clients***

Annually, we conduct eight (8) hours of investment training for our Florida clients. In addition, we frequently conduct CPE training for our clients' Investment Committees in conjunction with our quarterly performance reports.

We will provide educational presentations for your staff, management and other officials based on best practices of public financial management. Chandler is a registered sponsor on the National Registry of CPE Sponsors, affirming our commitment to the delivery of high quality continuing professional education. We have developed educational materials on a wide range of investment topics, including risk, duration, benchmarking and total return, corporate credit analysis, accounting and others. Learning opportunities can be scheduled in conjunction with regular portfolio reviews, or at other times more convenient for your staff. Some topics Chandler presented on recently are: *Market Update for 2020, Exploring Common Structured Securities, Maximizing your Banking Relationship, Tips for Conducting Credit Analysis, Investment Policy Training, Bond Market 101; Cash Flow, Asset/Liability Matching and Benchmarks; and Measuring Portfolio Performance.*

We communicate regularly via email to our clients with updates which include:

- Weekly economic updates provide a concise summary of economic and market news of the current week, key economic indicators, as well as topics for the next weeks' economic data releases. The update is sent via an email service that clients and interested parties receive each Friday;
- Monthly newsletter that includes a market summary, treasury yield curve graph and monthly percent changes, as well as economic data and statistics; and
- Ad hoc emails and communication such as Fed rate news, education pieces, whitepapers, technology and product updates.

**e) Describe the firm's in-house technical and research capabilities.**

Chandler's in-house investment research and analytical capabilities are extensive. Aided by inputs from our different investment committees, decisions are made by the investment team regarding duration positioning, sector allocation, term structure, and issue selection within the firm's macro view of the economic environment and broad-based view on interest rates and leading economic indicators. The investment team then incorporates these decisions as they apply to each individual portfolio. As our primary focus is on the management of fixed income securities for public agencies, the firm's analytical rigor is dedicated to the investment types we purchase on behalf of our clients, as well as the value identified between sectors and individual issuers.

***Research Tools, Technology, and Expertise***

Chandler conducts 100% of its research in-house. The investment management team subscribes to a variety of private research providers including BCA Research, Oxford Economics, Egan Jones, and CreditSights to augment the overall research efforts of the firm. The team keeps abreast of sell-side research from a broad group of domestic and international investment banks. These tools not only provide data for our investment processes but ensure that our clients have access to the most current and relevant market information. Chandler's professionals also conduct research projects on an ad hoc basis on issues concerning our industry and our clients, such as changes in the brokerage world, studies on how legislative changes impact our clients, and



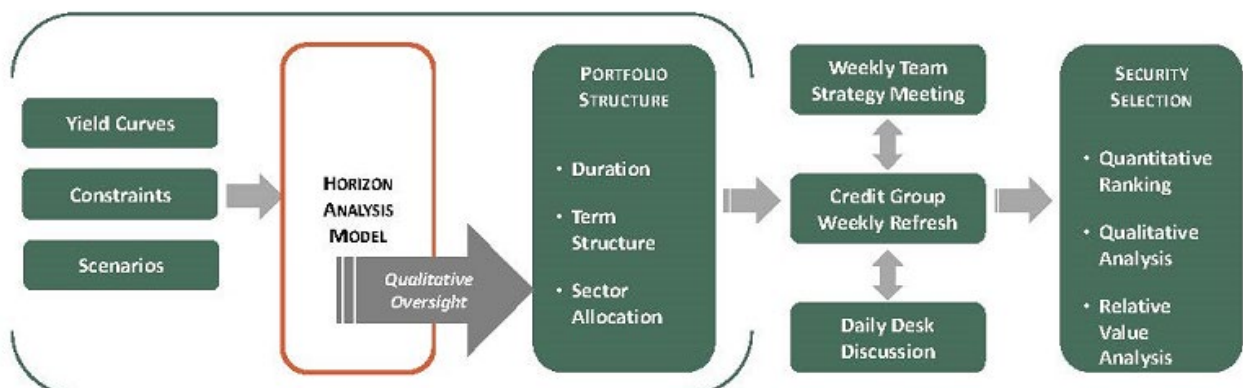
research on new sectors or investment structures as appropriate for our clients' portfolios. Additionally, internally developed, proprietary tools such as our Horizon Analysis Model, credit review/security selection process, and cash flow analysis provide a quantitative foundation for Chandler's portfolio construction process.

Chandler's proprietary Horizon Analysis Model is the quantitative foundation for the portfolio construction process. The Model is one of our primary tools for analyzing the risk/return between various investment alternatives. The Model enables our portfolio management team to integrate their research into the portfolio management process in a disciplined and repeatable way.

Inputs to the Model include:

- 1) current yields on Treasury, agency and corporate securities;
- 2) specific client constraints, such as maturity restrictions and maximum sector exposure; and
- 3) nine different probability-weighted forecasted interest rate scenarios that may occur at the six-month horizon date. Our analysis of current macroeconomic conditions is one of the factors we consider as we develop the nine scenarios that comprise the third input to the Model.

#### *Chandler's Investment Process*



Through an iterative process, the Model generates the “optimal portfolio structure” (duration, maturity distribution, and sector allocation), which we define as the portfolio that achieves a return greater than the benchmark in each of the nine scenarios. That is, the Model generates a portfolio structure that we expect will outperform the portfolio's benchmark over a wide range of possible future interest rate movements. The Investment Team then evaluates the optimal portfolio structure and using their expertise and judgement, may make adjustments as they begin the construction of the portfolio. This combination of a rigorous quantitative structure and experienced qualitative oversight is a hallmark of all Chandler's portfolio management activities.

### Chandler's Investment Management Committee

Investment Management Committee				
Martin Cassell, CFA CEO, CIO				
William Dennehy II, CFA Deputy Chief Investment Officer		Scott Prickett, CTP Deputy Chief Investment Officer		
Jayson Schmitt, CFA Deputy Chief Investment Officer		Genny Lynkiewicz, CFA Senior Portfolio Manager		
Ted Piorkowski, CFA Senior Portfolio Manager		Christopher McCarry, AIF Senior Portfolio Strategist		
Julie Hughes Senior Portfolio Strategist		Carlos Oblites Senior Portfolio Strategist		
Shelly Henbest, CFA Senior Credit Analyst		Devin Weinstein, CFA Assistant Portfolio Manager		
Economic and Market Analysis Committee	Credit Committee	Quantitative Analysis Committee	Sector Committee	Multi-Asset Class Committee
<ul style="list-style-type: none"> <li>Economic Outlook</li> <li>Market Analysis</li> <li>Develops Interest Rate Scenario Inputs for Horizon Analysis Model (HAM)</li> </ul>	<ul style="list-style-type: none"> <li>Fundamental Credit Analysis</li> <li>Security Relative Value Analysis</li> <li>Maintains Approved List</li> </ul>	<ul style="list-style-type: none"> <li>Reviews Committee Data</li> <li>Produces HAM Analysis</li> <li>Improves Model Methodology</li> </ul>	<ul style="list-style-type: none"> <li>Sector Valuation</li> <li>New Sector Analysis</li> <li>Develop Valuation Inputs</li> </ul>	<ul style="list-style-type: none"> <li>Reviews Global Markets and outlook</li> <li>Sets Capital Market Expectations</li> <li>Reviews and Enhances Investment Vehicles</li> </ul>

The **Economic and Market Analysis Committee** sets the macro-economic tone and investment strategy for our fixed-income investments and structuring of client portfolios given the current market climate. The Committee also focuses on the development of economic inputs and interest rate scenarios for the *Horizon Analysis Model*, the proprietary tool we employ to assist in developing portfolio structure.

The **Sector Committee** is tasked with sector valuation methodology, analysis of option-adjusted spreads and opportunities both among sectors and between issuers, and evaluation of new instruments and sectors for suitability.

The **Credit Committee** is responsible for evaluating issuers for inclusion, monitoring and possible removal from the firm's *Approved Issuer List*. The entire Portfolio Management Team and Chief Investment Officer Martin Cassell will review the committee's recommendations, including additions to and deletions from the firm's *Approved List*. Ultimate approval of credits is the responsibility of Martin Cassell. The committee's output ensures that the securities purchased for client portfolios are consistent with their risk profile.

The **Quantitative Analysis Committee** develops and sets the structure for the *Horizon Analysis Model* (HAM) and evaluates the *Model's* process for improved technology and methods. The results of the HAM output are used to develop general characteristics of the strategies.

The **Multi-Asset Class Committee** prepares the firm's Capital Market Assumptions, basing them on the firm's analysis of the global markets and our forward-looking outlook of the market environment. The Committee then develops the Efficient Frontier, and reviews and recommends initial and ongoing portfolio asset allocations and fund vehicles for our clients.

The firm's Chief Investment Officer, portfolio managers, portfolio strategists, credit analysts and portfolio management associates comprise the Investment Management Committee, leveraging

the experience and expertise of each professional for effective research, analysis, decision-making and communication.

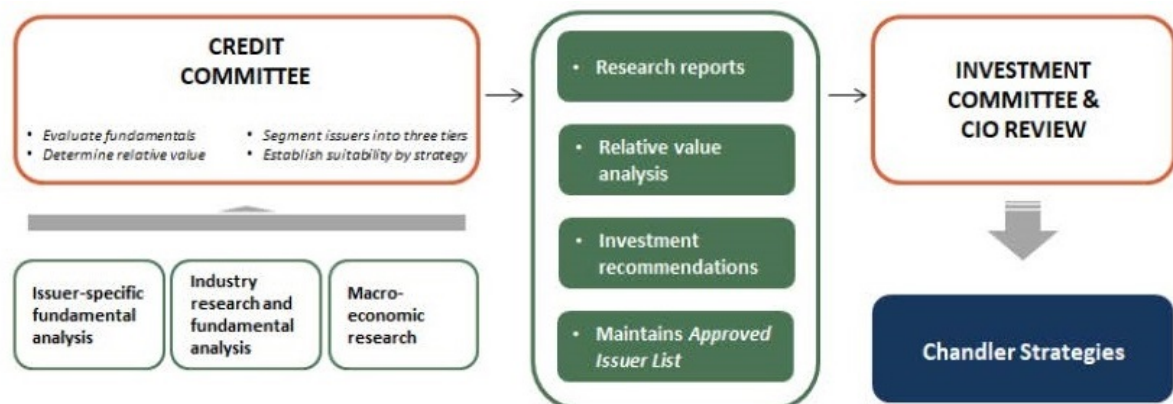
### ***Credit Review and Security Selection***

The firm's proprietary credit research process identifies stable and improving credits to include in client portfolios. Although the Nationally Recognized Statistical Rating Organizations ("NRSROs") typically determine the initial eligibility of a security, Chandler does not rely on these ratings to determine whether a security is suitable for a Chandler portfolio. Chandler's Credit Committee, with input from the entire investment team further vets the suitability of an investment based on our own internal research and a thorough understanding of each client's investment objectives and risk tolerances. This combination of qualitative and quantitative analysis enables the team to identify and invest in securities consistent with our clients' objectives of safety, liquidity, and return.

The dynamic nature of the process also provides the team with the ability to detect weak and deteriorating credits, which may be removed from client portfolios and Chandler's *Approved Issuer List*. In determining the suitability of a security, the Credit Committee analyzes company fundamentals with a focus on relative balance sheet strength and the overall earnings outlook of the issuer, paired with Chandler's view of the forward-looking macro-economic environment. After the fundamental outlook of an issuer has been ascertained, the Credit Committee focuses on the relative value of current and historical spreads of both the issuer and its industry sector. Chandler's internal credit process is designed to identify and evaluate changing fundamentals and the current relative value of issuers versus sector peers.

The Credit Committee meets weekly to rank issuers into three tiers and categorizes those securities based on individual client risk tolerance and policy guidelines. Each sector and issuer is reviewed at a minimum of once per quarter, or four times per year. The goal is to be proactive in identifying and investing in stable and improving credits, and in avoiding deteriorating credits.

### ***Chandler's Credit Review Process***



The investment management team continually conducts rigorous, multi-level credit analysis on bonds we consider for purchase on behalf of clients to assure they meet our high standards of credit quality. Chandler's disciplined security selection seeks to identify deteriorating credits, anticipate potential downgrades by the NRSROs, and sell credits that do not suit the risk characteristics of the overall portfolio. To accomplish this, all credits are monitored daily and are closely reviewed by our Credit Committee on at least a quarterly basis. Credits that are viewed as higher risk are reviewed more frequently. The Committee monitors the news on each issuer on our approved list on a daily basis (earnings releases, management presentations, ratings changes, etc.), and distributes this information to the entire Investment Management Team. If the Credit

Committee determines that the fundamentals of the underlying credit will deteriorate to a level that is not commensurate with the risk tolerance of the portfolio, the Credit Committee may act to sell the credit and/or remove the issuer from our approved credit list.

In addition, the following external systems and software are related to our trading, portfolio accounting and client reporting:

- *PAM for Securities Accounting system (Princeton Financial Systems)*- Main source of record where all portfolio transactions are stored. Holdings information are based on the transactions entered. Also stores SMF records, pricing, ratings, performance calculations, and other supporting data.
- *SQL Database*- Stores enterprise operational data such as account information, reporting/configuration, credit/index information, etc. Also stores copies of PAM data. Main source of information for 95% of our reporting. Remaining information comes from PAM, Access, or Bloomberg AIM reports.
- *SQL Reporting/Report Manager*- Main application that creates, automates reports, and displays reports.
- *Bloomberg AIM - Order Management System*. Imports holdings information from PAM and sends trading transactions to PAM. Also gets trade ticketing information, allocations, OASYS, settlement instructions enrichment. Compliance system used for pre-trade, post-trade, and end-of-day compliance testing and straight-through processing of investment transactions.
- *Bloomberg AIM – Asset and Investment Manager*. Through Bloomberg AIM's integration, Chandler anticipates the opportunity for increased workflow automation and synchronicity with the City's systems and more centralized and efficient operations. The Bloomberg AIM system provides seamless data integration that compliance, as well as post-trade automation such as trade and security master file (SMF) data automatically sent to our accounting system. Its compliance monitoring features will calculate and monitor asset class exposure, as well as issuer size and concentration limits, as well as compliance with the City's investment guidelines and legal requirements.

*Bloomberg AIM* also allows the portfolio manager to test the effects that a new security will have on an existing portfolio. For example, the team can propose a trade in Bloomberg AIM, and determine what impact the position will have on the portfolio's overall duration. In addition, we have the ability to perform an analysis on how a portfolio will be affected given a specified change in interest rates to ensure the portfolio will continue to meet the objectives of the portfolio. We also have the ability to see the impact of security transactions on the portfolio not only from a portfolio management standpoint but also the implications to the accounting such as the gain/loss of a security sale.

- *Electra Reconciliation System and Data Retrieval Services* – Custodian to PAM reconciliation system. Gathers and consolidates bank and manager data each night/morning, as it becomes available.
- *OASYS*- Product by OMGEO that communicates trade allocations to other participating OASYS brokers
- *Confirm/Affirm*- Product by OMGEO where the details of trades are communicated between the broker and Chandler in order to achieve settlement. This helps streamline settlements and notifies parties when trades details do not match.
- *Salesforce CRM* – Contact management, portfolio settings, report distribution settings.

The City is not required to purchase any additional programs or software that is utilized for

services under this engagement, relieving the need for to allocate capital in order to ensure portfolio optimization, policy compliance, financial reporting, and other crucial aspects of managing your funds.

**Periodic Rebalancing** – With the passage of time, portfolio characteristics tend to drift away from the desired structure. For that reason, the team reruns the *Horizon Analysis Model* monthly, reevaluates the optimal portfolio structure and rebalances to obtain the desired sector allocation and duration target as market conditions change. In addition, the benchmarks used by our clients for performance measurement are reconstituted monthly; therefore, we realign our portfolios with these benchmarks. As part of our active management approach, we will also rebalance when we find securities of superior value in terms of expected return or reduced risk or to adjust the credit quality of a holding for the portfolio.

**f) Describe the firm’s process for ensuring investment policy compliance, preventing and correcting investment policy exceptions and reporting of such compliance issues to the City.**

Portfolio managers use robust order management (“OMS”) and portfolio compliance software from **Bloomberg AIM** for monitoring compliance with client objectives, policies, trust indentures, and legal requirements on a pre-trade, post-trade, and end-of-day basis. At the inception of the relationship, a compliance officer codes each element of the investment policy and guidelines into the Bloomberg system. Since each trade originates in the system, pre-trade compliance testing is generated each time a portfolio manager prepares to execute a transaction. The system prohibits execution of the trade if it does not comply with the imputed guidelines. If an issue of non-compliance is identified through the system, it cannot be overridden by an investment team member and is escalated for review by a member of the Compliance Team.

Chandler’s Compliance Team is responsible for ensuring the firm complies with all regulatory requirements, client guidelines and firm policies and procedures. The firm’s COO and Chief Compliance Officer provides oversight of portfolio compliance and trade order management. These duties are conducted separately from the portfolio management team under the appropriate segregation of duties. As a part of our regular process of policy and guideline monitoring, we provide clients with a monthly detailed *Statement of Compliance*, based on our complete review of investments. This report details adherence to requirements such as permitted investments, asset class exposure, minimum credit quality, maximum maturities, issuer size and concentration limits, as well as compliance with the City’s investment guidelines and legal requirements. This *Statement* also serves as an effective means of reporting compliance to the City Council and other stakeholders and demonstrates that the City takes seriously its fiduciary duty to protect tax dollars.

As part of our multi-level compliance process, further procedures to ensure compliance with state laws, your investment policy, and objectives include:

- A daily reconciliation of transactions and cash balances with custodian information;
- A month-end review of the portfolio to confirm compliance with the Investment Policy;
- A continuous review process by the firm’s Credit Committee to ensure credit quality meets policy standards as well as our strict quality requirements;
- A portfolio structure that satisfies liquidity objectives with short-maturity securities and return objectives with higher duration investments;
- Frequent communication between our team and yours to help us stay informed of any new developments that may modify your objectives, and;
- Meetings with your staff as frequently as you choose to provide additional opportunities to



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review portfolio composition and performance at a high level.

**g) Describe any other additional features, attributes or conditions the City should consider in evaluating your firm.**

Leveraging resources from across the firm, we provide advice and investment manager analysis while bringing clients a personalized and local perspective. In addition, Chandler distinguishes itself from its competition in several ways, and in all aspects of the relationship with its clients, not limited to its investment management capabilities.

- **Deep history and experience.** Chandler's founder, CEO and other key investment professionals have worked as investment officers and finance directors of public agencies and have in-depth experience and knowledge of the issues public entities face in managing their assets effectively. Since 1988, Chandler has assisted public agencies fulfill their fiduciary duty to their constituents by providing high quality fixed income portfolios in a risk-conscious framework that conform to Florida State Statutes and directives. Chandler has the depth (experience) and breadth (service capabilities) with over three decades of performance history as an investment manager and is particularly qualified to meet the City's investment needs because of our experience in safeguarding our clients' funds and structuring them optimally to meet all objectives.
- **Direct contact with portfolio strategists.** Chandler offers its clients proactive, frequent contact with its lead investment management professionals and access to the investment management team who are responsible for making the decisions for your portfolio, allowing for customization and flexibility to changes in your program. Your key investment contacts as well as the rest of the investment management team will have a significant understanding of not only your investment portfolio, but also of where it fits in the overall program and its future objectives.
- **Resources.** Chandler's clients count on our extensive research and analytical capabilities used to identify opportunities and minimize risk. Our access to market information in conjunction with our proprietary credit review process makes our services of significant value. Additionally, our independent compliance team will ensure that all trades conform to Florida Statutes, the City's investment policy, and the customized investment strategy that we propose to the City's staff.
- **Commitment to client success.** We are dedicated to our role as fiduciaries to our clients and strive to ease the responsibility and operational requirements needed to effectively invest the City's assets. Our comprehensive services provide transparency, excellent client service, and successful investment program outcomes. We commit the full resources of the firm to ensure your success.

Chandler can provide additional services that will add value to the City's investment program including:

- Strategy development or customization of strategies suitable to the City's investment program;
- Other Post-Employment Benefit ("OPEB") Management. Chandler has been managing post-employee benefit accounts such as pension trusts and medical benefit trusts for clients since 2003. We use a multi-asset class strategy (Chandler's "MAC" Strategy) to achieve the objectives and target return of the plan;
- Provide staff with CPE credits; Chandler is a registered sponsor on the National Registry of CPE Sponsors, and can provide educational presentations for your staff, Board, and



constituents on a wide range of topics based on best practices of public financial management.;

- Management of the City's cash in strategies including short-term securities as an alternative to Local Government Investment Pools/other overnight investment vehicles;
- Management of bond reserves and/or bond proceeds;
- Evaluate Custodial bank/safekeeping services review and selection, and;
- Broker/dealer selection and monitoring.

As an investment advisor that has managed funds for public agencies for 32 years, we are well qualified to provide expert guidance and best practices for the City's investment program. Our team of 31 investment professionals, including 11 investment professionals will partner with the City to optimally structure the City's investment funds, strategize on ways to capitalize on market opportunities and control risk exposure in the portfolios.

Our organization structure is supportive of effective daily, weekly, monthly communication with the investment team managing the City's portfolio. Our team will work directly with staff to discuss and update the City on general and specific market conditions that could affect the investment strategies. They will provide insights on security analysis, review general credit trends and the process of tracking changing credits. Our goal with every client is to provide pro-active, client-centered service to detail and follow through. Our clients that have transitioned to Chandler from other investment advisers can attest to the difference in our services.

Members of the engagement team for the City participate in various committees supporting the investment process. Participation in a committee format provides a deeper technical understanding since we perform all research ourselves.

We provide both consolidated reporting for the entire investment program, as well as segregated accounting, performance and characteristics for each portfolio. We provide transparency through our online *Client Portal* which provides access to your portfolio information at any time. Improvement in operational efficiencies may save staff time and streamline month end accounting. Holdings Reports can be customized to display only the information that individual viewers may need. Customized Fields can be exported into a format compatible with your accounting systems and internal report formats. Trade activity is available daily via trade tickets accessible via the portal. Monthly statements are available by the third business day of the month and include complete accounting and portfolio information. Compliance with the City's Investment Policy is monitored daily on a pre-trade, post-trade, and end of day basis and reported monthly via a *Statement of Compliance*.

It is our goal to empower the City and its finance team through knowledgeable and timely support and consistent guidance in financial management. We value our relationships with all our clients and are quite proud of the fact that our client retention rate over the past five years is over 90%. We look forward to discussing with the City the full suite of service offerings Chandler can provide as its investment manager. We believe your staff will be optimally served by retaining Chandler as its investment manager and working collaboratively to keep the City of Hollywood in great fiscal shape.

- h) Provide your firm's intermediate-term investment (1-5 year) performance for the most recent five years. Please show quarterly returns, gross of all management fees. All performance numbers must be presented in accordance with the CFA Institute standards and the Global Investment Performance Standards.

We have included performance for three of Chandler's composite strategies most commonly used by our public agency clients: Chandler's **Ultra Short Bond** (0-3 year strategy), **Limited Maturity** (1-3 year strategy), and **Short Term Bond**, (1-5 year strategy). Chandler's Ultra Short Strategy is most comparable to the City's current investment policy. These strategy composites are comprised of individually managed accounts with an average modified duration approximately equal to the modified duration of the *ICE BAML Blended 0-3 Year US Treasury Index*, the *ICE BAML 1-3 Year US Treasury Index* and the *ICE BAML 1-5 Year US Treasury & Agency Index*<sup>4</sup>, respectively, and a final stated maturity of individual securities of five years.

#### Chandler Composite Performance – Gross and Net of Fees

As of September 30, 2020

	One Year	Three Years	Five Years	Ten Years	Since Inception
<b>Chandler Ultra Short Bond (gross)</b> (inception: 9/30/88)	<b>2.53%</b>	<b>2.43%</b>	<b>1.81%</b>	<b>1.20%</b>	<b>4.05%</b>
<b>Chandler Ultra Short Bond (net)</b>	<b>2.49%</b>	<b>2.39%</b>	<b>1.77%</b>	<b>1.16%</b>	<b>4.01%</b>
<i>ICE BAML Blended 0-3 Year US Treasury Index</i>	2.23%	2.14%	1.51%	0.95%	3.60%
<b>Chandler Limited Maturity (gross)</b> (inception: 9/30/88)	<b>3.65%</b>	<b>2.84%</b>	<b>2.05%</b>	<b>1.54%</b>	<b>4.57%</b>
<b>Chandler Limited Maturity (net)</b>	<b>3.61%</b>	<b>2.80%</b>	<b>2.01%</b>	<b>1.50%</b>	<b>4.53%</b>
<i>ICE BAML 1-3 Year US Treasury Index</i>	3.59%	2.64%	1.80%	1.28%	4.28%
<b>Chandler Short Term Bond (gross)</b> (inception: 9/30/95)	<b>4.71%</b>	<b>3.32%</b>	<b>2.43%</b>	<b>1.94%</b>	<b>4.12%</b>
<b>Chandler Short Term Bond (net)</b>	<b>4.67%</b>	<b>3.28%</b>	<b>2.39%</b>	<b>1.90%</b>	<b>4.08%</b>
<i>ICE BAML 1-5 Year US Treasury &amp; Agency Index</i>	4.58%	3.18%	2.19%	1.72%	3.85%

Based on Chandler's Ultra Short Bond, Limited Maturity, and Short Term Bond composites as of 9/30/2020. Performance results are presented gross and net of fees. Net returns are for a 4.5 basis points (0.045 of 1%) proposed for a \$100 million account, and are hypothetical and not based on an actual client's account. The performance has been calculated using historical composite performance. Gross performance does not reflect payment of advisory fees and other expenses which will reduce performance. Past performance is not a guarantee of future results. All investment strategies have the potential for profit or loss. Market conditions or economic factors may alter the performance and results of a portfolio. Investment advisory fees are disclosed in the firm's form ADV, Part 2A. Performance for periods greater than one year is annualized. Please see GIPS Composite Reports in the **Appendix**. For one-on-one presentation only.

Chandler develops and implements portfolio strategies that we tailor to meet the needs of public agency clients. We group portfolios with similar characteristics into composites for the purpose of computing and reporting GIPS®-compliant total return performance results. GIPS® represent an industry wide standard for performance calculation and reporting which facilitates comparison among investment firms. Chandler Asset Management claims compliance with the Global Investment Performance Standards (GIPS®) and prepares and presents its performance in

<sup>4</sup> Please see Important Disclosures in the Appendix.

compliance with these standards. Chandler is independently verified by ACA Performance Services for firm wide GIPS® compliance. A copy of the firm's most recent *GIPS® Verification Letter* is included in the **Appendix**.

### 2.3.9 TAB 7 – ACCOUNTING AND REPORTING

- a) Describe the investment accounting and reporting systems used by the firm, and confirm it complies with CFA Institute and Global Investment Performance standards.

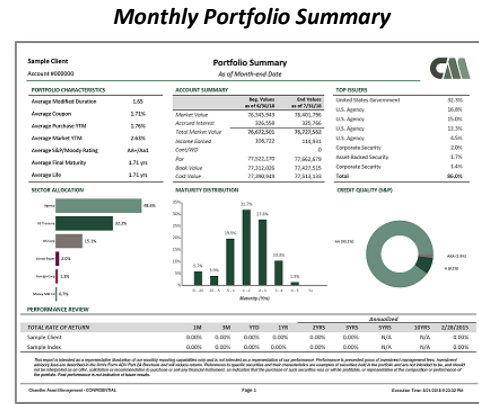
Chandler utilizes the accounting platform software of PAM for Investments, a State Street Company, to perform investment accounting and reporting. Using PAM as the investment book of record for our clients, we generate GAAP-compliant, comprehensive monthly statements and performance reports, which clients receive no later than the third business day following month end. Chandler provides monthly portfolio accounting and performance statements as well as mark-to-market fair value pricing for securities in accordance with GASB 31. Our standard reports currently include yield-to-maturity at purchase cost and market value, portfolio values at book, cost, and market, and portfolio total rate of return compared to the benchmark return for periods of one month, the most recent quarter, year to date, one year, three years, five years, ten years and since inception.

Reports are prepared in accordance with state law and the Governmental Accounting Standards Board (GASB) and are compiled to meet the needs of public agencies. Chandler claims compliance with the Global Investment Performance Standards (GIPS®) and prepares and presents its performance in compliance with these standards. Chandler is independently verified by ACA Performance Services for firmwide GIPS® compliance.

- b) Describe the firm's electronic reporting capabilities.

Chandler's client reports, holdings, transactions, trade tickets, special reports and other documents are available to the City on the *Chandler Client Portal*, a web-based reporting tool provided to clients as part of our comprehensive services. Reports can be downloaded in Excel format that can be mapped to your internal reporting requirements. There is no extra cost associated with use of the portal. Chandler does not require the City to purchase any additional programs or software that would be required for services under this engagement, relieving the need for to allocate capital in order to ensure portfolio optimization, policy compliance, financial reporting, and other crucial aspects of managing your funds.

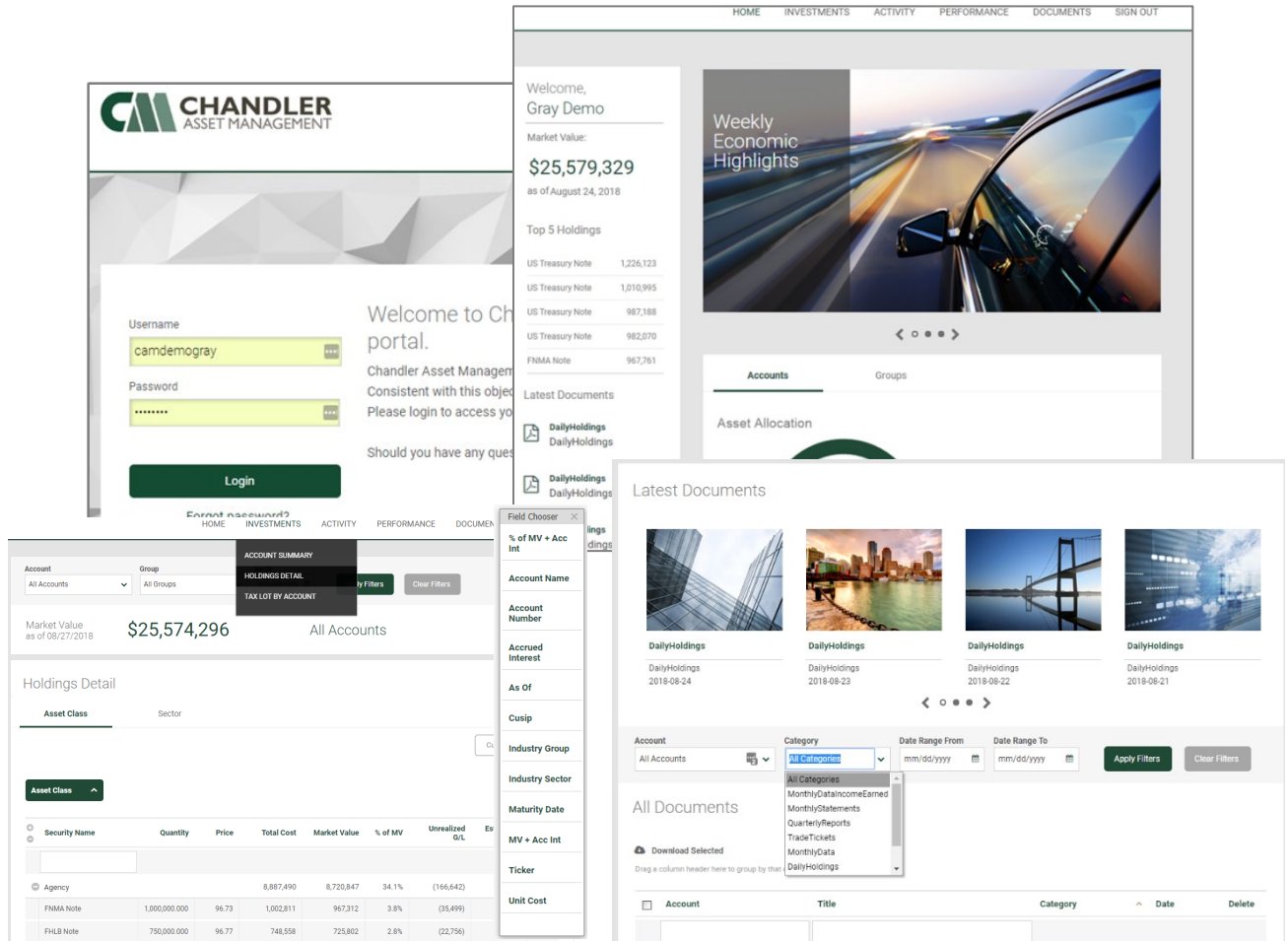
The *Chandler Client Portal* can integrate seamlessly with treasury management solution software and enterprise resource planning ("ERP") software to provide increased data aggregation and transparency. Clients who log into the portal are able to download financial information in order to integrate it with financial and investment management systems like Tyler-Munis and Sympro. It has been our experience that over time, many clients using our reporting package concurrently with treasury management software find that our reporting module is robust enough to provide all the data they will need to report on their investments. As a result, many of our clients end up achieving a savings by removing the redundancy of a separate software solution.



*This sample report is being provided for illustrative purposes to demonstrate Chandler's reporting capabilities. References to specific securities and their characteristics are examples of securities held in a portfolio and are not intended to be, and should not be interpreted as an offer, solicitation, or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio.*

Access to the *Chandler Client Portal* is available to individual contacts selected by the City, and is accessible 24 hours a day, 7 days a week. Chandler's secure *Client Portal* can be accessed via [chandlerasset.com](http://chandlerasset.com).

### Chandler Client Portal



The screenshots illustrate the Chandler Client Portal interface. The top navigation bar includes links for HOME, INVESTMENTS, ACTIVITY, PERFORMANCE, DOCUMENTS, and SIGN OUT. The main dashboard displays a welcome message for 'Gray Demo', a market value of \$25,579,329 as of August 24, 2018, and a list of top 5 holdings including US Treasury Note and FHMA Note. A 'Weekly Economic Highlights' section features a car driving on a road. Below this, there are sections for 'Accounts', 'Groups', 'Asset Allocation', and 'Latest Documents'.

A detailed view of the 'Holdings Detail' section is shown, displaying a table of holdings with columns for Security Name, Quantity, Price, Total Cost, Market Value, % of MV, and Unrealized G/L. The table lists holdings for 'Agency' and 'FHMA Note'.

The 'Latest Documents' section shows a grid of document thumbnails with titles like 'DailyHoldings' and dates. A 'Field Chooser' dropdown menu is visible, listing various document types such as 'All Categories', 'MonthlyDataIncomeEarned', 'MonthlyStatements', 'QuarterlyReports', 'TradeTickets', 'MonthlyData', and 'DailyHoldings'.

*These sample reports are being provided for illustrative purposes to demonstrate Chandler's reporting capabilities. References to specific securities are examples of securities held in a portfolio and are not intended to be, and should not be interpreted as an offer, solicitation, or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio.*

We confirm that Chandler's comprehensive reports and *Client Portal* will meet or exceed all of the City's accounting and reporting requirements.

- c) **Describe the frequency and format of reports the firm would provide to the City, including the methods and formulas used to calculate yield and performance. Provide a sample report.**

**Monthly Statements:** Monthly statements include a summary of portfolio characteristics, performance and full accounting details. Reports may be structured to include the City's managed investments as well as its liquid funds in LGIPs and cash. Chandler's consolidation of the City's accounts offers both a "broken-out" as well as an aggregated view of the City's entire investment program for increased transparency and operational efficiency. This provides you with a rolled up or complete view of your investment program. Reports as well as holdings, trade tickets, and historical data is available to the City via Chandler's online reporting tool, the *Chandler Client*

*Portal.* Monthly reports are available no later than the third business day following month-end.

**Portfolio Reports**

- *Portfolio characteristics*
- *Account Summary Detail*
- *Sector Allocation*
- *Maturity Distribution*
- *Credit Quality*
- *Total Rate of Return*

**Accounting Reports**

- *Security Holdings*
- *Transactions*
- *Amortization/Accretion*
- *Interest Income and Accruals*
- *Realized & Unrealized Gains and Losses*
- *GASB 40 & 72 Annual Reporting*

Chandler's monthly reports conform to reporting standards established by state legal requirements and statutes governing public investments and include full asset listings including fair market value of investments, issuer, maturity date, interest rate, transactions for the period, and a description of the funds and investment programs. In addition, Chandler offers its clients transparency through a *Statement of Compliance* with state legal requirements and the investment policy, and a one-page summary with portfolio characteristics and total return for various period compared to market benchmarks.

In addition, Chandler's reports will detail the following:

- A Holdings Report, showing security description, par value, cost, book value, market value, accrued interest, gain/loss, book yield, duration, maturity, Moody's, Fitch, and S&P ratings, and percent of portfolio for each holding.
- A cash flow projection from upcoming investment maturities and interest payments.
- A Transaction Ledger that reports all acquisitions, dispositions, interest payments, cash contributions and withdrawals, and any other transactions for the period.
- An Earned Interest Report, displaying all interest earnings, including accrued and received interest, amortization and accretion in detail form and summarized.

***Quarterly Reports:*** We present quarterly investment reports in a format designed to facilitate discussion between Chandler investment professionals and the City's staff. The report provides current economic data, portfolio characteristics and return on both an aggregate basis as well as for individual portfolios, compliance and a summary of accounts under management using graphs, charts and illustrations in a format that is effective for management, elected officials and interested members of the public. We provide this report for our regular meetings with the City.

**Formulas for Calculating Total Return**

The firm measures performance using the Modified Dietz Method which is described as time-weighted total rate of return (TRR), calculated and geometrically linked monthly, and is compared to a market total return benchmark selected by the client, in accordance with industry standards (GIPS). We also report cost and market yields on a security and portfolio basis. The gross-of-fee return is net of transaction costs and gross of management, custodian and withholding taxes. The net return only differs in that it includes management fees assessed to the account.

The following are descriptions of the industry standard return and yield calculations that we employ at Chandler:

***Time-Weighted Total Rate of Return (TWTRR)*** – Measures the compounded rate of growth of the initial portfolio market value during the evaluation period, assuming that all cash flows are reinvested in the portfolio. The time-weighted rate of return is the rate of growth that equates the beginning market value to the ending market value. We calculate TWTRR monthly and link the periodic returns geometrically.



The following formula shows how Chandler calculates *Total Rate of Return*:

$$R_{TR} = \frac{MV_E - MV_B}{MV_B}$$

Where:  $R_{TR}$  = total return  
 $MV_E$  = ending market value, including interest accruals  
 $MV_B$  = beginning market value, including interest accruals

For periods greater than one year, common practice is to annualize the total rate of return by raising  $R_{TR}$  to a power equal to  $1/n$ , where  $n$  = number of years. For example, if  $R_{TR}$  is calculated for a 5-year period, the annualized return would be  $R_{TR}$  raised to the power of  $1/5$ , or .20. Per GIPS standards, total return for periods of less than one year is not annualized. We are also able to calculate and provide book return which utilizes amortized cost to exclude the impact of unrealized gains and losses on portfolio value.

We have provided our *Sample Client Monthly Statement, Quarterly Report, and GASB 40 and 72 Reports* in the **Appendix**.

**d) Describe the firm's ability to assist the City with investment related disclosure requirements in the City's comprehensive annual financial reports if requested.**

We provide a GASB 40 report to all governmental clients, which provides the information needed to prepare the required fiscal year-end portfolio risk assessment, and we are able to assist the City in drafting the narratives for GASB notes. We have developed a GASB 72 report which is available by fiscal yearend. The GASB 72, Fair Value Measurement and Application, issued in February of 2015, requires government investments to be measured at fair market value. It also requires disclosures regarding how fair value was measured, what hierarchy the investment fits into and any special valuation processes used.

**e) Describe the type of benchmarks that would be included with the performance reports.**

We will work with your finance staff to identify appropriate benchmarks that can demonstrate the City's progress relative to its objectives and risk profile. We import all the constituents of a specific benchmark into our system and perform detailed analysis designed to optimize the performance of each client's portfolio relative to that benchmark.

Performance benchmarks serve a dual purpose: first, an appropriate benchmark will reflect a client's investment objectives and permitted investments, as well as the client's risk tolerance and liquidity requirements. The benchmark should reflect the actual securities being purchased and the risks undertaken and should have a similar weighted average maturity and credit profile as the portfolio. Second, the benchmark should be the basis for discussion about incremental outperformance of the portfolio relative to the benchmark. That is, the goal is not just to "beat" the benchmark, but also to analyze what factors contributed to differences in performance. Since the benchmark reflects the risk profile of the client, it is important to understand whether the manager is taking on undesired risk to achieve results.

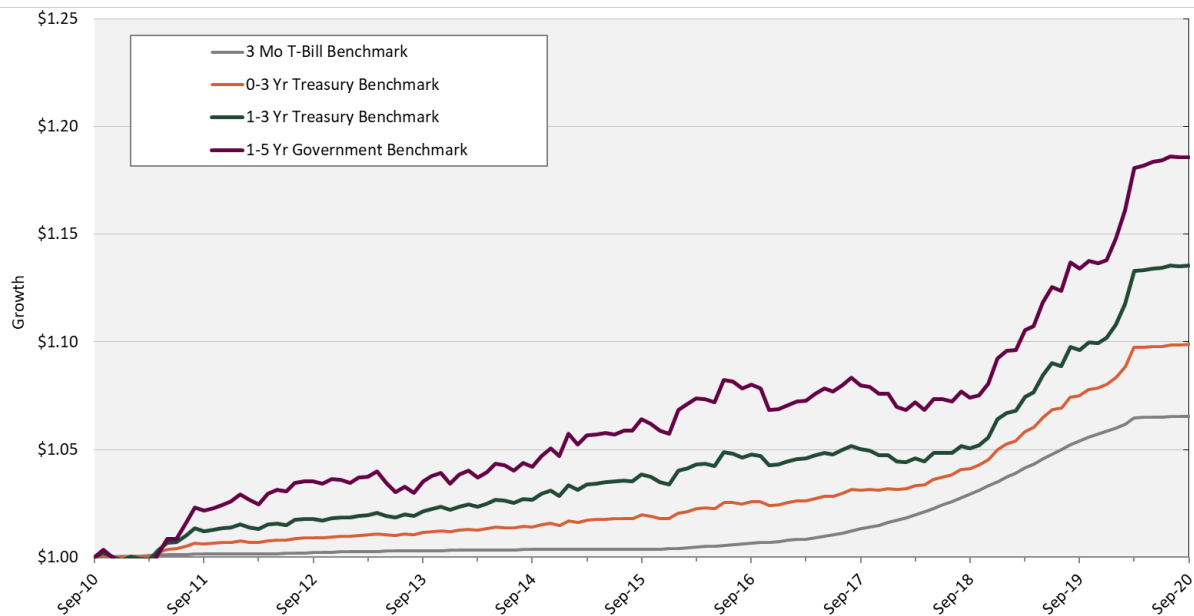
At the inception of the engagement with the City, investment professionals will present characteristics of Chandler's investment strategies, as well as a benchmark study that analyzes the risk/return characteristics of benchmarks to consider for performance measurement that will align with the City's tolerance. Cash flow directed accounts can be managed to a short duration benchmark, such as the *ICE BAML 3-month US Treasury Bill Index* or LGIPs like Florida PRIME<sup>5</sup>

<sup>5</sup> Please see Important Disclosures in the **Appendix**.

which accommodate overnight liquidity needs and have the relative short durations. Benchmarks that some of our other Florida public agency clients have selected for their reserve funds, which may also be appropriate for the City's portfolios include:

- *Florida PRIME*
- *ICE Bank of America Merrill Lynch 3 Month US T-Bill Index*
- *ICE Bank of America Merrill Lynch 0-3 Year US Treasury Index*
- *ICE Bank of America Merrill Lynch 1-3 Year US Treasury Index*
- *ICE Bank of America Merrill Lynch 1-5 Year US Treasury & Agency Index*<sup>6</sup>

### Benchmark Comparison September 30, 2010 through September 30, 2020



Source: ICE BAML Indices as of 9/30/2020. Please see disclosures attached for ICE BAML 3 Month T-Bill Index, 0-3 Year US Treasury Index, 1-3 Year US Treasury Index, and 1-5 Year US Treasury & Agency Index. The data contained in this chart is the property of providers which were obtained from sources believed to be reliable but are subject to change at any time at the provider's discretion. Index returns assume reinvestment of income dividends and capital gains, if any, but do not reflect fees, brokerage commissions or other expenses of investing. It is not possible to invest directly in an index. Past performance is not indicative of future results.

<sup>6</sup> Please see Important Disclosures in the **Appendix**.

**Value of \$100 Million (Hypothetical)**  
*September 30, 2010 through September 30, 2020*

Benchmark	Duration	9/30/2020	Annualized Return
3 Month T-Bill Index	0.25	\$106,547,238	0.64%
0-3 Year Treasury Index	0.90	\$109,876,608	0.95%
1-3 Year Treasury Index	1.83	\$113,550,819	1.28%
1-5 Year Government Index	2.57	\$118,583,910	1.72%

*Source: ICE BAML Indices as of 9/30/2020. Performance of the \$100 million portfolio shown is hypothetical and not based on an actual client's account. Past performance is not indicative of future results. Index returns are unmanaged and reflect the reinvestment of income dividends and capital gains, if any, but do not reflect fees, brokerage commissions or other expenses of investing. It is not possible to invest directly in an index. Please see Important Disclosures in the **Appendix**.*

As the graph and chart demonstrate, the longer the duration of the benchmark, the greater its return over time. For a sample \$100 million portfolio, the *ICE BAML 1-5 Year U.S. Treasury & Agency Index*, with a duration of 2.57 returned approximately \$12,000,000 more than the *3 Month T-Bill Treasury Index*, which has a duration of 0.25<sup>7</sup>. In general, the portfolios should be structured to have the highest suitable duration target that meets the City's return expectations and risk tolerance. That is, the target duration for each of the City's portfolios should be as high as the staff feels comfortable with, given the risk and return characteristics implied by duration.

Our analysis and recommendation for appropriate benchmarks and performance measurement for each of the City's separate accounts will be ongoing with the City as the interest rate environment and shape of the yield curve changes over time. We strive for superior risk-adjusted returns across market environments relative to our clients' chosen benchmarks in all of our strategies by focusing on the philosophies of safety of principal, appropriate levels of liquidity, and low volatility of return.

<sup>7</sup> Past performance is not indicative of future results. Please see important disclosures in the **Appendix**.

**2.3.10 TAB 8 – FEE PROPOSAL**
**a) Provide the firm's proposed fee schedule.**

Chandler's proposed fee schedule for comprehensive investment management services for the City of Hollywood is as follows:

**Proposed Fee Schedule for the City of Hollywood**

Assets Under Management	Annual Asset Management Fee
First \$50 million	5 basis points (0.05 of 1%)
Next \$50 million	4 basis points (0.04 of 1%)
Assets over \$100 million	3 basis points (0.03 of 1%)

Our proposed fee schedule is all-inclusive for the services that Chandler provides, including full time investment management services, technological resources, onboarding and implementation, online access to the *Chandler Client Portal*, comprehensive reporting, meetings, personal visits, and educational offerings for your staff, as well as the investment advisory and treasury management support services described in the City's *Scope of Services* and herein Chandler's proposal.

Since the firm calculates fees based on the average balance of assets under our direct management (market value including accrued interest), fees in dollars will fluctuate (higher or lower) based on the actual portfolio value. The proposed fee in basis points is firm for the entire term of the contract, and the City will not be subject to any increases during this period.

Fees are not transaction based, and there are no minimum balance requirements. Funds not under our management, such as those in LGIPs and internally managed liquid funds will be excluded from fee calculations. We can consolidate these funds in our reports to you as part of our services at no extra expense to the City.

An example of the fees assessed to the City at different asset levels according to the above proposed tiered fee schedule are as follows:

<u>Total Assets Under Management</u>	<u>Annual Fee in Basis Points</u>	<u>Annual Fee in \$ dollars</u>
\$50 million	5 bps	\$25,000
\$75 million	4.67 bps	\$35,000
\$100 million	4.5 bps	\$45,000
\$125 million	4.2 bps	\$52,500
\$150 million	4 bps	\$60,000

**b) List what expenses, if any, not covered by the fees, would the City be expected to pay.**

Our fee schedule does not include charges that the City would incur for third-party custodial services, as we are not a provider of those services.

**c) Provide a sample of a proposed contract for your firm's services.**

We have included herein with our submission our *Sample Investment Management Agreement* for your review.

- d) To the extent the City would request the Investment Manager to render services other than those covered by this contract, such additional services would be compensated separately under terms and conditions to be agreed upon by the Investment Manager and the City.**

We agree to separately negotiate for any additional services provided to the City other than those covered by this contract.

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### 2.3.11 TAB 9 - INSURANCE

**Summarize fidelity bond coverage, errors and omissions, employee dishonesty, fiduciary liability insurance, and other fiduciary coverage your firm carries. Refer to the insurance requirements section of this RFQ.**

Chandler maintains a comprehensive, full-coverage insurance program with the relevant coverages provided by firms rated “Excellent” or better by AM Best Rating, including the following:

EO/DO (professional liability)	\$20 million (\$200,000 retention);
Fidelity Bond/Employee Dishonesty:	\$10 million/\$100,000 deductible;
Commercial General Liability:	\$2,000,000 per occurrence/\$4,000,000 aggregate;
Umbrella Liability:	\$10,000,000 per occurrence/\$10,000,000 aggregate;
Cybersecurity:	\$4,000,000;
Automobile Liability:	\$1,000,000 combined single limit.

We have included a copy of our *ACORD Certificate of Liability* in the **Appendix**.

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Chandler Asset Management, Inc, An Independent Registered Investment Adviser. This report is provided for informational purposes only and should not be construed as specific investment or legal advice. The information contained herein was obtained from sources believed to be reliable as of the date of publication but may become outdated or superseded at any time without notice. Any opinions or views expressed are based on current market conditions and are subject to change. This report may contain forecasts and forward-looking statements which are inherently limited and should not be relied upon as an indicator of future results. Past performance is not indicative of future results. This report is not intended to constitute an offer, solicitation, recommendation or advice regarding any securities or investment strategy and should not be regarded by recipients as a substitute for the exercise of their own judgment. Fixed income investments are subject to interest, credit, and market risk. *Interest rate risk*: the value of fixed income investments will decline as interest rates rise. *Credit risk*: the possibility that the borrower may not be able to repay interest and principal. Low rated bonds generally have to pay higher interest rates to attract investors willing to take on greater risk. *Market risk*: the bond market in general could decline due to economic conditions, especially during periods of rising interest rates.





## Chandler Asset Management

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### Appendices



## **Appendix A**

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### **Form ADV, Parts 1 and 2**

# FORM ADV

## UNIFORM APPLICATION FOR INVESTMENT ADVISER REGISTRATION AND REPORT BY EXEMPT REPORTING ADVISERS

Primary Business Name: CHANDLER ASSET MANAGEMENT INC

CRD Number: 107287

Other-Than-Annual Amendment - All Sections

Rev. 03/2020

6/15/2020 10:37:32 AM

**WARNING:** Complete this form truthfully. False statements or omissions may result in denial of your application, revocation of your registration, or criminal prosecution. You must keep this form updated by filing periodic amendments. See Form ADV General Instruction 4.

### Item 1 Identifying Information

Responses to this Item tell us who you are, where you are doing business, and how we can contact you. If you are filing an *umbrella registration*, the information in Item 1 should be provided for the *filing adviser* only. General Instruction 5 provides information to assist you with filing an *umbrella registration*.

A. Your full legal name (if you are a sole proprietor, your last, first, and middle names):

**CHANDLER ASSET MANAGEMENT INC**

B. (1) Name under which you primarily conduct your advisory business, if different from Item 1.A.

**CHANDLER ASSET MANAGEMENT INC**

List on Section 1.B. of Schedule D any additional names under which you conduct your advisory business.

(2) If you are using this Form ADV to register more than one investment adviser under an *umbrella registration*, check this box ☐

If you check this box, complete a Schedule R for each relying adviser.

C. If this filing is reporting a change in your legal name (Item 1.A.) or primary business name (Item 1.B.(1)), enter the new name and specify whether the name change is of

☐ your legal name or ☐ your primary business name:

D. (1) If you are registered with the SEC as an investment adviser, your SEC file number: **801-44378**

(2) If you report to the SEC as an *exempt reporting adviser*, your SEC file number:

(3) If you have one or more Central Index Key numbers assigned by the SEC ("CIK Numbers"), all of your CIK numbers:

**CIK Number**

1665018

E. (1) If you have a number ("CRD Number") assigned by the FINRA's CRD system or by the IARD system, your CRD number: **107287**

If your firm does not have a CRD number, skip this Item 1.E. Do not provide the CRD number of one of your officers, employees, or affiliates.

(2) If you have additional CRD Numbers, your additional CRD numbers:

No Information Filed

F. Principal Office and Place of Business

(1) Address (do not use a P.O. Box):

Number and Street 1:

6225 LUSK BOULEVARD

City:

SAN DIEGO

State:

California

Number and Street 2:

Country:

United States

ZIP+4/Postal Code:

92121-2796

If this address is a private residence, check this box: ☐

*List on Section 1.F. of Schedule D any office, other than your principal office and place of business, at which you conduct investment advisory business. If you are applying for registration, or are registered, with one or more state securities authorities, you must list all of your offices in the state or states to which you are applying for registration or with whom you are registered. If you are applying for SEC registration, if you are registered only with the SEC, or if you are reporting to the SEC as an exempt reporting adviser, list the largest twenty-five offices in terms of numbers of employees as of the end of your most recently completed fiscal year.*

(2) Days of week that you normally conduct business at your *principal office and place of business*:

☒ Monday - Friday ☐ Other:

Normal business hours at this location:

6:00 AM TO 5:00 PM

(3) Telephone number at this location:

858.546.3737

(4) Facsimile number at this location, if any:

858.546.3741

(5) What is the total number of offices, other than your *principal office and place of business*, at which you conduct investment advisory business as of the end of your most recently completed fiscal year?

5

G. Mailing address, if different from your *principal office and place of business* address:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

If this address is a private residence, check this box: ☐

H. If you are a sole proprietor, state your full residence address, if different from your *principal office and place of business* address in Item 1.F.:

Number and Street 1:

Number and Street 2:

City:

State:

Country:

ZIP+4/Postal Code:

**Yes No**

I. Do you have one or more websites or accounts on publicly available social media platforms (including, but not limited to, Twitter, Facebook and LinkedIn)? ☒ ☐

*If "yes," list all firm website addresses and the address for each of the firm's accounts on publicly available social media platforms on Section 1.I. of Schedule D. If a website address serves as a portal through which to access other information you have published on the web, you may list the portal without listing addresses for all of the other information. You may need to list more than one portal address. Do not provide the addresses of websites or accounts on publicly available social media platforms where you do not control the content. Do not provide the individual electronic mail (e-mail) addresses of employees or the addresses of employee accounts on publicly available social media platforms.*

J. Chief Compliance Officer

(1) Provide the name and contact information of your Chief Compliance Officer. If you are an *exempt reporting adviser*, you must provide the contact information for your Chief Compliance Officer, if you have one. If not, you must complete Item 1.K. below.

Name:

NICOLE M. DRAGOO

Other titles, if any:

CHIEF OPERATING OFFICER

Telephone number:

858.546.3737

Facsimile number, if any:

858.546.3741

Number and Street 1:

6225 LUSK BOULEVARD

Number and Street 2:

City:

SAN DIEGO

State:

California

Country:

United States

ZIP+4/Postal Code:

92121-2796

Electronic mail (e-mail) address, if Chief Compliance Officer has one:  
NDRAGOO@CHANDLERASSET.COM

(2) If your Chief Compliance Officer is compensated or employed by any *person* other than you, a *related person* or an investment company registered under the Investment Company Act of 1940 that you advise for providing chief compliance officer services to you, provide the *person's* name and IRS Employer Identification Number (if any):

Name:

IRS Employer Identification Number:

- K. Additional Regulatory Contact Person: If a person other than the Chief Compliance Officer is authorized to receive information and respond to questions about this Form ADV, you may provide that information here.

Name:

JOSEPH KOLINSKY

Titles:

COMPLIANCE MANAGER

Telephone number:

858.546.3737

Facsimile number, if any:

858.546.3741

Number and Street 1:

6225 LUSK BOULEVARD

Number and Street 2:

City:

SAN DIEGO

State:

California

Country:

United States

ZIP+4/Postal Code:

92121-2796

Electronic mail (e-mail) address, if contact person has one:

JKOLINSKY@CHANDLERASSET.COM

Yes No

- L. Do you maintain some or all of the books and records you are required to keep under Section 204 of the Advisers Act, or similar state law, somewhere other than your *principal office and place of business*? ☒ ☐

If "yes," complete Section 1.L. of Schedule D.

Yes No

- M. Are you registered with a *foreign financial regulatory authority*? ☐ ☒

Answer "no" if you are not registered with a *foreign financial regulatory authority*, even if you have an affiliate that is registered with a *foreign financial regulatory authority*. If "yes," complete Section 1.M. of Schedule D.

Yes No

- N. Are you a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934? ☐ ☒

Yes No

- O. Did you have \$1 billion or more in assets on the last day of your most recent fiscal year? ☐ ☒

If yes, what is the approximate amount of your assets:

- ☐ \$1 billion to less than \$10 billion  
☐ \$10 billion to less than \$50 billion  
☐ \$50 billion or more

For purposes of Item 1.O. only, "assets" refers to your total assets, rather than the assets you manage on behalf of clients. Determine your total assets using the total assets shown on the balance sheet for your most recent fiscal year end.

- P. Provide your *Legal Entity Identifier* if you have one:

254900E9BJWINIZ90E91

A *legal entity identifier* is a unique number that companies use to identify each other in the financial marketplace. You may not have a *legal entity identifier*.

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**SECTION 1.B. Other Business Names**

No Information Filed

**SECTION 1.F. Other Offices**

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:		Number and Street 2:	
1875 LAWRENCE STREET		SUITE 920	
City:	State:	Country:	ZIP+4/Postal Code:
DENVER	Colorado	United States	80202

If this address is a private residence, check this box: ☐

Telephone Number:	Facsimile Number, if any:
800.317.4747	303.295.0513

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?  
3

Are other business activities conducted at this office location? (check all that apply)

- ☐ (1) Broker-dealer (registered or unregistered)
- ☐ (2) Bank (including a separately identifiable department or division of a bank)
- ☐ (3) Insurance broker or agent
- ☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (5) Registered municipal advisor
- ☐ (6) Accountant or accounting firm
- ☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:		Number and Street 2:	
801 2ND AVENUE		SUITE 800	
City:	State:	Country:	ZIP+4/Postal Code:
SEATTLE	Washington	United States	98104

If this address is a private residence, check this box: ☐



Telephone Number:  
206-489-5610

Facsimile Number, if any:  
206-489-5611

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?  
1

Are other business activities conducted at this office location? (check all that apply)

- ☐ (1) Broker-dealer (registered or unregistered)
- ☐ (2) Bank (including a separately identifiable department or division of a bank)
- ☐ (3) Insurance broker or agent
- ☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (5) Registered municipal advisor
- ☐ (6) Accountant or accounting firm
- ☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:  
801 INTERNATIONAL PARKWAY

Number and Street 2:  
SUITE 500

City:  
LAKE MARY

State:  
Florida

Country:  
United States

ZIP+4/Postal Code:  
32746

If this address is a private residence, check this box: ☐

Telephone Number:  
407-739-8797

Facsimile Number, if any:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?  
1

Are other business activities conducted at this office location? (check all that apply)

- ☐ (1) Broker-dealer (registered or unregistered)
- ☐ (2) Bank (including a separately identifiable department or division of a bank)
- ☐ (3) Insurance broker or agent
- ☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (5) Registered municipal advisor
- ☐ (6) Accountant or accounting firm
- ☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:  
7250 REDWOOD BOULEVARD

Number and Street 2:  
SUITE 300

City:  
NOVATO

State:  
California

Country:  
United States

ZIP+4/Postal Code:  
94945

If this address is a private residence, check this box: ☐

Telephone Number:  
415.798.5586

Facsimile Number, if any:  
858.546.3741

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?  
1

Are other business activities conducted at this office location? (check all that apply)

- ☐ (1) Broker-dealer (registered or unregistered)
- ☐ (2) Bank (including a separately identifiable department or division of a bank)
- ☐ (3) Insurance broker or agent
- ☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (5) Registered municipal advisor
- ☐ (6) Accountant or accounting firm
- ☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

Complete the following information for each office, other than your *principal office and place of business*, at which you conduct investment advisory business. You must complete a separate Schedule D Section 1.F. for each location. If you are applying for SEC registration, if you are registered only with the SEC, or if you are an *exempt reporting adviser*, list only the largest twenty-five offices (in terms of numbers of *employees*).

Number and Street 1:  
2121 N. CALIFORNIA BLVD

Number and Street 2:  
SUITE 290

City:  
WALNUT CREEK

State:  
California

Country:  
United States

ZIP+4/Postal Code:  
94596

If this address is a private residence, check this box: ☐

Telephone Number:  
800-317-4747

Facsimile Number, if any:

If this office location is also required to be registered with FINRA or a *state securities authority* as a branch office location for a broker-dealer or investment adviser on the Uniform Branch Office Registration Form (Form BR), please provide the *CRD* Branch Number here:

How many *employees* perform investment advisory functions from this office location?

0

Are other business activities conducted at this office location? (check all that apply)

- ☐ (1) Broker-dealer (registered or unregistered)
- ☐ (2) Bank (including a separately identifiable department or division of a bank)
- ☐ (3) Insurance broker or agent
- ☐ (4) Commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (5) Registered municipal advisor
- ☐ (6) Accountant or accounting firm
- ☐ (7) Lawyer or law firm

Describe any other *investment-related* business activities conducted from this office location:

### SECTION 1.I. Website Addresses

List your website addresses, including addresses for accounts on publicly available social media platforms where you control the content (including, but not limited to, Twitter, Facebook and/or LinkedIn). You must complete a separate Schedule D Section 1.I. for each website or account on a publicly available social media platform.

Address of Website/Account on Publicly Available Social Media Platform: HTTP://WWW.CHANDLERASSET.COM

Address of Website/Account on Publicly Available Social Media Platform: HTTPS://WWW.LINKEDIN.COM/COMPANY/911143/

### SECTION 1.L. Location of Books and Records

Complete the following information for each location at which you keep your books and records, other than your *principal office and place of business*. You must complete a separate Schedule D, Section 1.L. for each location.

Name of entity where books and records are kept:

CORODATA

Number and Street 1:  
12370 KERRAN STREET

Number and Street 2:

City:  
POWAY

State:  
California

Country:  
United States

ZIP+4/Postal Code:  
92064

If this address is a private residence, check this box: ☐

Telephone Number:  
858.748.7202

Facsimile number, if any:  
858.748.9506

This is (check one):

☒ one of your branch offices or affiliates.

- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.

BROKERAGE CONFIRMS OLDER THAN 2 YEARS, CLIENT STATEMENTS, CLOSED ACCOUNT FILES, AND ARCHIVED ACCOUNTS PAYABLE RECORDS.

Name of entity where books and records are kept:

SMARSH

Number and Street 1:

110 WILLIAM STREET

Number and Street 2:

SUITE 1804

City:

NEW YORK

State:

New York

Country:

United States

ZIP+4/Postal Code:

10038

If this address is a private residence, check this box: ☐

Telephone Number:

866-762-7741

Facsimile number, if any:

This is (check one):

- ☐ one of your branch offices or affiliates.
- ☒ a third-party unaffiliated recordkeeper.
- ☐ other.

Briefly describe the books and records kept at this location.

EMAIL ARCHIVING

#### SECTION 1.M. Registration with Foreign Financial Regulatory Authorities

No Information Filed

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**Item 2 SEC Registration/Reporting**

Responses to this Item help us (and you) determine whether you are eligible to register with the SEC. Complete this Item 2.A. only if you are applying for SEC registration or submitting an *annual updating amendment* to your SEC registration. If you are filing an *umbrella registration*, the information in Item 2 should be provided for the *filing adviser* only.

A. To register (or remain registered) with the SEC, you must check **at least one** of the Items 2.A.(1) through 2.A.(12), below. If you are submitting an *annual updating amendment* to your SEC registration and you are no longer eligible to register with the SEC, check Item 2.A.(13). Part 1A Instruction 2 provides information to help you determine whether you may affirmatively respond to each of these items.

You (the adviser):

- ☒ (1) are a **large advisory firm** that either:
- (a) has regulatory assets under management of \$100 million (in U.S. dollars) or more; or
  - (b) has regulatory assets under management of \$90 million (in U.S. dollars) or more at the time of filing its most recent *annual updating amendment* and is registered with the SEC;
- ☐ (2) are a **mid-sized advisory firm** that has regulatory assets under management of \$25 million (in U.S. dollars) or more but less than \$100 million (in U.S. dollars) and you are either:
- (a) not required to be registered as an adviser with the *state securities authority* of the state where you maintain your *principal office and place of business*; or
  - (b) not subject to examination by the *state securities authority* of the state where you maintain your *principal office and place of business*;
- Click **HERE** for a list of states in which an investment adviser, if registered, would not be subject to examination by the state securities authority.*
- ☐ (3) Reserved
- ☐ (4) have your *principal office and place of business* **outside the United States**;
- ☐ (5) are an **investment adviser (or subadviser) to an investment company** registered under the Investment Company Act of 1940;
- ☐ (6) are an **investment adviser to a company which has elected to be a business development company** pursuant to section 54 of the Investment Company Act of 1940 and has not withdrawn the election, and you have at least \$25 million of regulatory assets under management;
- ☐ (7) are a **pension consultant** with respect to assets of plans having an aggregate value of at least \$200,000,000 that qualifies for the exemption in rule 203A-2(a);
- ☐ (8) are a **related adviser** under rule 203A-2(b) that *controls*, is *controlled* by, or is under common *control* with, an investment adviser that is registered with the SEC, and your *principal office and place of business* is the same as the registered adviser;
- If you check this box, complete Section 2.A.(8) of Schedule D.*
- ☐ (9) are an **adviser** relying on rule 203A-2(c) because you **expect to be eligible for SEC registration within 120 days**;
- If you check this box, complete Section 2.A.(9) of Schedule D.*
- ☐ (10) are a **multi-state adviser** that is required to register in 15 or more states and is relying on rule 203A-2(d);
- If you check this box, complete Section 2.A.(10) of Schedule D.*
- ☐ (11) are an **Internet adviser** relying on rule 203A-2(e);
- ☐ (12) have **received an SEC order** exempting you from the prohibition against registration with the SEC;
- If you check this box, complete Section 2.A.(12) of Schedule D.*
- ☐ (13) are **no longer eligible** to remain registered with the SEC.

**State Securities Authority Notice Filings and State Reporting by Exempt Reporting Advisers**

C. Under state laws, SEC-registered advisers may be required to provide to *state securities authorities* a copy of the Form ADV and any amendments they file with the SEC. These are called *notice filings*. In addition, *exempt reporting advisers* may be

required to provide *state securities authorities* with a copy of reports and any amendments they file with the SEC. If this is an initial application or report, check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to direct your *notice filings* or reports to additional state(s), check the box(es) next to the state(s) that you would like to receive notice of this and all subsequent filings or reports you submit to the SEC. If this is an amendment to your registration to stop your *notice filings* or reports from going to state(s) that currently receive them, uncheck the box(es) next to those state(s).

#### Jurisdictions

<input checked="" type="checkbox"/> AL	<input checked="" type="checkbox"/> IL	<input checked="" type="checkbox"/> NE	<input checked="" type="checkbox"/> SC
<input checked="" type="checkbox"/> AK	<input checked="" type="checkbox"/> IN	<input checked="" type="checkbox"/> NV	<input type="checkbox"/> SD
<input checked="" type="checkbox"/> AZ	<input type="checkbox"/> IA	<input checked="" type="checkbox"/> NH	<input checked="" type="checkbox"/> TN
<input checked="" type="checkbox"/> AR	<input checked="" type="checkbox"/> KS	<input checked="" type="checkbox"/> NJ	<input checked="" type="checkbox"/> TX
<input checked="" type="checkbox"/> CA	<input type="checkbox"/> KY	<input checked="" type="checkbox"/> NM	<input checked="" type="checkbox"/> UT
<input checked="" type="checkbox"/> CO	<input checked="" type="checkbox"/> LA	<input checked="" type="checkbox"/> NY	<input type="checkbox"/> VT
<input checked="" type="checkbox"/> CT	<input checked="" type="checkbox"/> ME	<input checked="" type="checkbox"/> NC	<input type="checkbox"/> VI
<input checked="" type="checkbox"/> DE	<input checked="" type="checkbox"/> MD	<input type="checkbox"/> ND	<input checked="" type="checkbox"/> VA
<input checked="" type="checkbox"/> DC	<input checked="" type="checkbox"/> MA	<input checked="" type="checkbox"/> OH	<input checked="" type="checkbox"/> WA
<input checked="" type="checkbox"/> FL	<input checked="" type="checkbox"/> MI	<input checked="" type="checkbox"/> OK	<input checked="" type="checkbox"/> WV
<input type="checkbox"/> GU	<input checked="" type="checkbox"/> MN	<input checked="" type="checkbox"/> OR	<input checked="" type="checkbox"/> WI
<input checked="" type="checkbox"/> HI	<input type="checkbox"/> MS	<input checked="" type="checkbox"/> PA	<input type="checkbox"/> WY
<input checked="" type="checkbox"/> ID	<input checked="" type="checkbox"/> MO	<input type="checkbox"/> PR	
	<input type="checkbox"/> MT	<input checked="" type="checkbox"/> RI	

*If you are amending your registration to stop your notice filings or reports from going to a state that currently receives them and you do not want to pay that state's notice filing or report filing fee for the coming year, your amendment must be filed before the end of the year (December 31).*

#### SECTION 2.A.(8) Related Adviser

If you are relying on the exemption in rule 203A-2(b) from the prohibition on registration because you *control*, are *controlled by*, or are under common *control* with an investment adviser that is registered with the SEC and your *principal office and place of business* is the same as that of the registered adviser, provide the following information:

Name of Registered Investment Adviser

CRD Number of Registered Investment Adviser

SEC Number of Registered Investment Adviser

-

#### SECTION 2.A.(9) Investment Adviser Expecting to be Eligible for Commission Registration within 120 Days

If you are relying on rule 203A-2(c), the exemption from the prohibition on registration available to an adviser that expects to be eligible for SEC registration within 120 days, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations. You must make both of these representations:

- ☐ I am not registered or required to be registered with the SEC or a *state securities authority* and I have a reasonable expectation that I will be eligible to register with the SEC within 120 days after the date my registration with the SEC becomes effective.
- ☐ I undertake to withdraw from SEC registration if, on the 120th day after my registration with the SEC becomes effective, I would be prohibited by Section 203A(a) of the Advisers Act from registering with the SEC.

#### SECTION 2.A.(10) Multi-State Adviser



If you are relying on rule 203A-2(d), the multi-state adviser exemption from the prohibition on registration, you are required to make certain representations about your eligibility for SEC registration. By checking the appropriate boxes, you will be deemed to have made the required representations.

If you are applying for registration as an investment adviser with the SEC, you must make both of these representations:

- ☐ I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of 15 or more states to register as an investment adviser with the *state securities authorities* in those states.
- ☐ I undertake to withdraw from SEC registration if I file an amendment to this registration indicating that I would be required by the laws of fewer than 15 states to register as an investment adviser with the *state securities authorities* of those states.

If you are submitting your *annual updating amendment*, you must make this representation:

- ☐ Within 90 days prior to the date of filing this amendment, I have reviewed the applicable state and federal laws and have concluded that I am required by the laws of at least 15 states to register as an investment adviser with the *state securities authorities* in those states.

#### **SECTION 2.A.(12) SEC Exemptive Order**

If you are relying upon an SEC *order* exempting you from the prohibition on registration, provide the following information:

Application Number:

803-

Date of *order*:

**Item 3 Form of Organization**

If you are filing an *umbrella registration*, the information in Item 3 should be provided for the *filing adviser* only.

A. How are you organized?

- ☒ Corporation
- ☐ Sole Proprietorship
- ☐ Limited Liability Partnership (LLP)
- ☐ Partnership
- ☐ Limited Liability Company (LLC)
- ☐ Limited Partnership (LP)
- ☐ Other (specify):

*If you are changing your response to this Item, see Part 1A Instruction 4.*

B. In what month does your fiscal year end each year?

DECEMBER

C. Under the laws of what state or country are you organized?

State      Country

California    United States

*If you are a partnership, provide the name of the state or country under whose laws your partnership was formed. If you are a sole proprietor, provide the name of the state or country where you reside.*

*If you are changing your response to this Item, see Part 1A Instruction 4.*

**Item 4 Successions****Yes No**

- A. Are you, at the time of this filing, succeeding to the business of a registered investment adviser, including, for example, a change of your structure or legal status (e.g., form of organization or state of incorporation)?

☐ ☒

*If "yes", complete Item 4.B. and Section 4 of Schedule D.*

- B. Date of Succession: (MM/DD/YYYY)

*If you have already reported this succession on a previous Form ADV filing, do not report the succession again. Instead, check "No." See Part 1A Instruction 4.*

**SECTION 4 Successions**

No Information Filed

**Item 5 Information About Your Advisory Business - Employees, Clients, and Compensation**

Responses to this Item help us understand your business, assist us in preparing for on-site examinations, and provide us with data we use when making regulatory policy. Part 1A Instruction 5.a. provides additional guidance to newly formed advisers for completing this Item 5.

**Employees**

*If you are organized as a sole proprietorship, include yourself as an employee in your responses to Item 5.A. and Items 5.B.(1), (2), (3), (4), and (5). If an employee performs more than one function, you should count that employee in each of your responses to Items 5.B.(1), (2), (3), (4), and (5).*

A. Approximately how many *employees* do you have? Include full- and part-time *employees* but do not include any clerical workers.  
31

B. (1) Approximately how many of the *employees* reported in 5.A. perform investment advisory functions (including research)?  
15

(2) Approximately how many of the *employees* reported in 5.A. are registered representatives of a broker-dealer?  
0

(3) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives*?  
15

(4) Approximately how many of the *employees* reported in 5.A. are registered with one or more *state securities authorities* as *investment adviser representatives* for an investment adviser other than you?  
0

(5) Approximately how many of the *employees* reported in 5.A. are licensed agents of an insurance company or agency?  
0

(6) Approximately how many firms or other *persons* solicit advisory *clients* on your behalf?  
0

*In your response to Item 5.B.(6), do not count any of your employees and count a firm only once – do not count each of the firm's employees that solicit on your behalf.*

**Clients**

*In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.*

C. (1) To approximately how many *clients* for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?  
1

(2) Approximately what percentage of your *clients* are non-United States persons?  
0%

D. *For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships. The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (d)(1) or (d)(3) below.*

Indicate the approximate number of your *clients* and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of *client*. If you have fewer than 5 *clients* in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a *client* fits into more than one category, select one category that most accurately represents the *client* to avoid double counting *clients* and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

Type of Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets under Management
(a) Individuals (other than <i>high net worth individuals</i> )	465	<input type="checkbox"/>	\$ 229,865,855
(b) <i>High net worth individuals</i>	221	<input type="checkbox"/>	\$ 138,446,515
(c) Banking or thrift institutions	1	<input checked="" type="checkbox"/>	\$ 1,140,448
(d) Investment companies	0		\$ 0
(e) Business development companies	0		\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	0		\$ 0
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	2	<input checked="" type="checkbox"/>	\$ 22,531,474
(h) Charitable organizations	26	<input type="checkbox"/>	\$ 117,783,724
(i) State or municipal <i>government entities</i> (including government pension plans)	148	<input type="checkbox"/>	\$ 15,657,758,708
(j) Other investment advisers	0	<input type="checkbox"/>	\$ 0
(k) Insurance companies	0	<input type="checkbox"/>	\$ 0
(l) Sovereign wealth funds and foreign official institutions	0	<input type="checkbox"/>	\$ 0
(m) Corporations or other businesses not listed above	17	<input type="checkbox"/>	\$ 74,166,665
(n) Other: HOSPITALS	4	<input type="checkbox"/>	\$ 3,310,454,058

### Compensation Arrangements

E. You are compensated for your investment advisory services by (check all that apply):

- ☒ (1) A percentage of assets under your management  
☒ (2) Hourly charges  
☐ (3) Subscription fees (for a newsletter or periodical)  
☒ (4) Fixed fees (other than subscription fees)  
☐ (5) Commissions  
☐ (6) *Performance-based fees*  
☐ (7) Other (specify):

### Item 5 Information About Your Advisory Business - Regulatory Assets Under Management

#### Regulatory Assets Under Management

		Yes	No
F. (1)	Do you provide continuous and regular supervisory or management services to securities portfolios?	<input checked="" type="radio"/>	<input type="radio"/>
(2)	If yes, what is the amount of your regulatory assets under management and total number of accounts?		
	U.S. Dollar Amount	Total Number of Accounts	
Discretionary:	(a) \$ 16,367,505,580	(d)	1,008
Non-Discretionary:	(b) \$ 3,184,641,867	(e)	66
Total:	(c) \$ 19,552,147,447	(f)	1,074

*Part 1A Instruction 5.b. explains how to calculate your regulatory assets under management. You must follow these instructions carefully when completing this Item.*

- (3) What is the approximate amount of your total regulatory assets under management (reported in Item 5.F.(2)(c) above) attributable to *clients* who are non-United States persons?

**Item 5 Information About Your Advisory Business - Advisory Activities****Advisory Activities**

G. What type(s) of advisory services do you provide? Check all that apply.

- ☐ (1) Financial planning services
- ☒ (2) Portfolio management for individuals and/or small businesses
- ☐ (3) Portfolio management for investment companies (as well as "business development companies" that have made an election pursuant to section 54 of the Investment Company Act of 1940)
- ☐ (4) Portfolio management for pooled investment vehicles (other than investment companies)
- ☒ (5) Portfolio management for businesses (other than small businesses) or institutional *clients* (other than registered investment companies and other pooled investment vehicles)
- ☐ (6) Pension consulting services
- ☐ (7) Selection of other advisers (including *private fund* managers)
- ☐ (8) Publication of periodicals or newsletters
- ☐ (9) Security ratings or pricing services
- ☐ (10) Market timing services
- ☐ (11) Educational seminars/workshops
- ☒ (12) Other(specify): CONSULTING

*Do not check Item 5.G.(3) unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, including as a subadviser. If you check Item 5.G.(3), report the 811 or 814 number of the investment company or investment companies to which you provide advice in Section 5.G.(3) of Schedule D.*

H. If you provide financial planning services, to how many *clients* did you provide these services during your last fiscal year?

- ☐ 0
- ☐ 1 - 10
- ☐ 11 - 25
- ☐ 26 - 50
- ☐ 51 - 100
- ☐ 101 - 250
- ☐ 251 - 500
- ☐ More than 500

If more than 500, how many?  
(round to the nearest 500)

*In your responses to this Item 5.H., do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.*

**Yes No**

I. (1) Do you participate in a *wrap fee program*? ☒ ☐

(2) If you participate in a *wrap fee program*, what is the amount of your regulatory assets under management attributable to acting as:

(a) *sponsor to a wrap fee program*

\$ 0

(b) *portfolio manager for a wrap fee program?*

\$ 179,950,835

(c) *sponsor to and portfolio manager for the same wrap fee program?*

\$ 0

*If you report an amount in Item 5.I.(2)(c), do not report that amount in Item 5.I.(2)(a) or Item 5.I.(2)(b).*

*If you are a portfolio manager for a wrap fee program, list the names of the programs, their sponsors and related information in Section 5.I.(2) of Schedule D.*



If your involvement in a wrap fee program is limited to recommending wrap fee programs to your clients, or you advise a mutual fund that is offered through a wrap fee program, do not check Item 5.I.(1) or enter any amounts in response to Item 5.I.(2).

- |    |  | Yes                              | No                               |
|----|--|----------------------------------|----------------------------------|
| J. | (1) In response to Item 4.B. of Part 2A of Form ADV, do you indicate that you provide investment advice only with respect to limited types of investments?                         | <input checked="" type="radio"/> | <input type="radio"/>            |
|    | (2) Do you report <i>client</i> assets in Item 4.E. of Part 2A that are computed using a different method than the method used to compute your regulatory assets under management? | <input type="radio"/>            | <input checked="" type="radio"/> |

K. Separately Managed Account *Clients*

- |  | Yes                              | No                    |
|--|----------------------------------|-----------------------|
| (1) Do you have regulatory assets under management attributable to <i>clients</i> other than those listed in Item 5.D.(3)(d)-(f) (separately managed account <i>clients</i> )? | <input checked="" type="radio"/> | <input type="radio"/> |

If yes, complete Section 5.K.(1) of Schedule D.

- |  |                       |                                  |
|--|-----------------------|----------------------------------|
| (2) Do you engage in borrowing transactions on behalf of any of the separately managed account <i>clients</i> that you advise? | <input type="radio"/> | <input checked="" type="radio"/> |
|--|-----------------------|----------------------------------|

If yes, complete Section 5.K.(2) of Schedule D.

- |   |                       |                                  |
|---|-----------------------|----------------------------------|
| (3) Do you engage in derivative transactions on behalf of any of the separately managed account <i>clients</i> that you advise? | <input type="radio"/> | <input checked="" type="radio"/> |
|---|-----------------------|----------------------------------|

If yes, complete Section 5.K.(2) of Schedule D.

- |  |                                  |                       |
|--|----------------------------------|-----------------------|
| (4) After subtracting the amounts in Item 5.D.(3)(d)-(f) above from your total regulatory assets under management, does any custodian hold ten percent or more of this remaining amount of regulatory assets under management? | <input checked="" type="radio"/> | <input type="radio"/> |
|--|----------------------------------|-----------------------|

If yes, complete Section 5.K.(3) of Schedule D for each custodian.

### SECTION 5.G.(3) Advisers to Registered Investment Companies and Business Development Companies

No Information Filed

### SECTION 5.I.(2) Wrap Fee Programs

If you are a portfolio manager for one or more *wrap fee programs*, list the name of each program and its *sponsor*. You must complete a separate Schedule D Section 5.I.(2) for each *wrap fee program* for which you are a portfolio manager.

Name of *Wrap Fee Program*

MANAGED ACCOUNTS SELECT

Name of *Sponsor*

CHARLES SCHWAB & CO., INC.

*Sponsor's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

801 - 29938

*Sponsor's* CRD Number (if any):

5393

Name of *Wrap Fee Program*

SEPARATELY MANAGED ACCOUNTS (SMA) PROGRAM

Name of *Sponsor*

ENVESTNET PMC

*Sponsor's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

801 - 57260

*Sponsor's* CRD Number (if any):

111694

Name of *Wrap Fee Program*

UNIFIED MANAGED ACCOUNTS ("UMA") PROGRAM

Name of *Sponsor*

ENVESTNET PMC

*Sponsor's* SEC File Number (if any) (e.g., 801-, 8-, 866-, 802-):

801 - 57260

*Sponsor's* CRD Number (if any):

111694

**SECTION 5.K.(1) Separately Managed Accounts**

After subtracting the amounts reported in Item 5.D.(3)(d)-(f) from your total regulatory assets under management, indicate the approximate percentage of this remaining amount attributable to each of the following categories of assets. If the remaining amount is at least \$10 billion in regulatory assets under management, complete Question (a). If the remaining amount is less than \$10 billion in regulatory assets under management, complete Question (b).

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

If you are a subadviser to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date. Each column should add up to 100% and numbers should be rounded to the nearest percent.

Investments in derivatives, registered investment companies, business development companies, and pooled investment vehicles should be reported in those categories. Do not report those investments based on related or underlying portfolio assets. Cash equivalents include bank deposits, certificates of deposit, bankers' acceptances and similar bank instruments.

Some assets could be classified into more than one category or require discretion about which category applies. You may use your own internal methodologies and the conventions of your service providers in determining how to categorize assets, so long as the methodologies or conventions are consistently applied and consistent with information you report internally and to current and prospective clients. However, you should not double count assets, and your responses must be consistent with any instructions or other guidance relating to this Section.

(a)	Asset Type	Mid-year	End of year
(i)	Exchange-Traded Equity Securities	0 %	0 %
(ii)	Non Exchange-Traded Equity Securities	0 %	0 %

(iii) U.S. Government/Agency Bonds	62 %	62 %
(iv) U.S. State and Local Bonds	1 %	1 %
(v) <i>Sovereign Bonds</i>	0 %	0 %
(vi) Investment Grade Corporate Bonds	20 %	19 %
(vii) Non-Investment Grade Corporate Bonds	2 %	1 %
(viii) Derivatives	0 %	0 %
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	8 %	9 %
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	0 %	0 %
(xi) Cash and Cash Equivalents	7 %	6 %
(xii) Other	0 %	2 %

Generally describe any assets included in "Other"

MORTGAGE-BACKED SECURITIES (MBS), ASSET-BACKED SECURITIES (ABS) AND COLLATERALIZED MORTGAGE OBLIGATIONS (CMOS)

(b) Asset Type	End of year
(i) Exchange-Traded Equity Securities	%
(ii) Non Exchange-Traded Equity Securities	%
(iii) U.S. Government/Agency Bonds	%
(iv) U.S. State and Local Bonds	%
(v) <i>Sovereign Bonds</i>	%
(vi) Investment Grade Corporate Bonds	%
(vii) Non-Investment Grade Corporate Bonds	%
(viii) Derivatives	%
(ix) Securities Issued by Registered Investment Companies or Business Development Companies	%
(x) Securities Issued by Pooled Investment Vehicles (other than Registered Investment Companies or Business Development Companies)	%
(xi) Cash and Cash Equivalents	%
(xii) Other	%

Generally describe any assets included in "Other"

## SECTION 5.K.(2) Separately Managed Accounts - Use of Borrowings and Derivatives

☐ No information is required to be reported in this Section 5.K.(2) per the instructions of this Section 5.K.(2)

If your regulatory assets under management attributable to separately managed accounts are at least \$10 billion, you should complete Question (a). If your regulatory assets under management attributable to separately managed accounts are at least \$500 million but less than \$10 billion, you should complete Question (b).

(a) In the table below, provide the following information regarding the separately managed accounts you advise. If you are a subadvisor to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise. End of year refers to the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. Mid-year is the date six months before the end of year date.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage

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obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

In column 3, provide aggregate *gross notional value* of derivatives divided by the aggregate regulatory assets under management of the accounts included in column 1 with respect to each category of derivatives specified in 3(a) through (f).

You may, but are not required to, complete the table with respect to any separately managed account with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

(i) Mid-Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	(3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

(ii) End of Year

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings	(3) Derivative Exposures					
			(a) Interest Rate Derivative	(b) Foreign Exchange Derivative	(c) Credit Derivative	(d) Equity Derivative	(e) Commodity Derivative	(f) Other Derivative
Less than 10%	\$	\$	%	%	%	%	%	%
10-149%	\$	\$	%	%	%	%	%	%
150% or more	\$	\$	%	%	%	%	%	%

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

- (b) In the table below, provide the following information regarding the separately managed accounts you advise as of the date used to calculate your regulatory assets under management for purposes of your *annual updating amendment*. If you are a subadvisor to a separately managed account, you should only provide information with respect to the portion of the account that you subadvise.

In column 1, indicate the regulatory assets under management attributable to separately managed accounts associated with each level of gross notional exposure. For purposes of this table, the gross notional exposure of an account is the percentage obtained by dividing (i) the sum of (a) the dollar amount of any *borrowings* and (b) the *gross notional value* of all derivatives, by (ii) the regulatory assets under management of the account.

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In column 2, provide the dollar amount of *borrowings* for the accounts included in column 1.

You may, but are not required to, complete the table with respect to any separately managed accounts with regulatory assets under management of less than \$10,000,000.

Any regulatory assets under management reported in Item 5.D.(3)(d), (e), and (f) should not be reported below.

Gross Notional Exposure	(1) Regulatory Assets Under Management	(2) Borrowings
Less than 10%	\$	\$
10-149%	\$	\$
150% or more	\$	\$

Optional: Use the space below to provide a narrative description of the strategies and/or manner in which *borrowings* and derivatives are used in the management of the separately managed accounts that you advise.

### SECTION 5.K.(3) Custodians for Separately Managed Accounts

Complete a separate Schedule D Section 5.K.(3) for each custodian that holds ten percent or more of your aggregate separately managed account regulatory assets under management.

(a) Legal name of custodian:

THE BANK OF NEW YORK MELLON CORPORATION

(b) Primary business name of custodian:

BNY MELLON

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:

JACKSONVILLE

State:

Florida

Country:

United States

Yes No

(d) Is the custodian a *related person* of your firm?

☐ ☒

(e) If the custodian is a broker-dealer, provide its SEC registration number (if any)

-

(f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)

WFLPEPC7FZXENRZV188

(g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?

\$ 3,516,554,332

(a) Legal name of custodian:

WELLS FARGO BANK N.A.O

(b) Primary business name of custodian:

WELLS FARGO

(c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :

City:

MINNEAPOLIS

State:

Minnesota

Country:

United States

Yes No

(d) Is the custodian a *related person* of your firm?

☐ ☒

- (e) If the custodian is a broker-dealer, provide its SEC registration number (if any)  
-
- (f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)  
PBLD0EJDB5FWOLXP3B76
- (g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?  
\$ 4,324,461,685

- (a) Legal name of custodian:  
U.S. BANK, NA
- (b) Primary business name of custodian:  
US BANK, NA
- (c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :
- |            |        |               |
|------------|--------|---------------|
| City:      | State: | Country:      |
| CINCINNATI | Ohio   | United States |
- Yes No**
- (d) Is the custodian a *related person* of your firm?  
☐ ☒
- (e) If the custodian is a broker-dealer, provide its SEC registration number (if any)  
-
- (f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)  
6BYL5QZYBDK8S7L73M02
- (g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?  
\$ 3,681,182,281

- (a) Legal name of custodian:  
MUFG UNION BANK, N.A
- (b) Primary business name of custodian:  
MUFG UNION BANK, N.A
- (c) The location(s) of the custodian's office(s) responsible for *custody* of the assets :
- |           |            |               |
|-----------|------------|---------------|
| City:     | State:     | Country:      |
| SAN DIEGO | California | United States |
- Yes No**
- (d) Is the custodian a *related person* of your firm?  
☐ ☒
- (e) If the custodian is a broker-dealer, provide its SEC registration number (if any)  
-
- (f) If the custodian is not a broker-dealer, or is a broker-dealer but does not have an SEC registration number, provide its *legal entity identifier* (if any)  
OX3PU53ZLPQKJ4700D47
- (g) What amount of your regulatory assets under management attributable to separately managed accounts is held at the custodian?  
\$ 2,513,089,459



**Item 6 Other Business Activities**

In this Item, we request information about your firm's other business activities.

A. You are actively engaged in business as a (check all that apply):

- ☐ (1) broker-dealer (registered or unregistered)
- ☐ (2) registered representative of a broker-dealer
- ☐ (3) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (4) futures commission merchant
- ☐ (5) real estate broker, dealer, or agent
- ☐ (6) insurance broker or agent
- ☐ (7) bank (including a separately identifiable department or division of a bank)
- ☐ (8) trust company
- ☐ (9) registered municipal advisor
- ☐ (10) registered security-based swap dealer
- ☐ (11) major security-based swap participant
- ☐ (12) accountant or accounting firm
- ☐ (13) lawyer or law firm
- ☐ (14) other financial product salesperson (specify):

*If you engage in other business using a name that is different from the names reported in Items 1.A. or 1.B.(1), complete Section 6.A. of Schedule D.*

- |  | <b>Yes</b>            | <b>No</b>                        |
|--|-----------------------|----------------------------------|
| B. (1) Are you actively engaged in any other business not listed in Item 6.A. (other than giving investment advice)? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) If yes, is this other business your primary business?  | <input type="radio"/> | <input type="radio"/>            |

*If "yes," describe this other business on Section 6.B.(2) of Schedule D, and if you engage in this business under a different name, provide that name.*

- |   | <b>Yes</b>            | <b>No</b>                        |
|---|-----------------------|----------------------------------|
| (3) Do you sell products or provide services other than investment advice to your advisory <i>clients</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |

*If "yes," describe this other business on Section 6.B.(3) of Schedule D, and if you engage in this business under a different name, provide that name.*

**SECTION 6.A. Names of Your Other Businesses**

No Information Filed

**SECTION 6.B.(2) Description of Primary Business**

Describe your primary business (not your investment advisory business):

If you engage in that business under a different name, provide that name:

**SECTION 6.B.(3) Description of Other Products and Services**

Describe other products or services you sell to your *client*. You may omit products and services that you listed in Section 6.B.(2) above.

If you engage in that business under a different name, provide that name:

**Item 7 Financial Industry Affiliations**

In this Item, we request information about your financial industry affiliations and activities. This information identifies areas in which conflicts of interest may occur between you and your *clients*.

- A. This part of Item 7 requires you to provide information about you and your *related persons*, including foreign affiliates. Your *related persons* are all of your *advisory affiliates* and any *person* that is under common *control* with you.

You have a *related person* that is a (check all that apply):

- ☐ (1) broker-dealer, municipal securities dealer, or government securities broker or dealer (registered or unregistered)
- ☐ (2) other investment adviser (including financial planners)
- ☐ (3) registered municipal advisor
- ☐ (4) registered security-based swap dealer
- ☐ (5) major security-based swap participant
- ☐ (6) commodity pool operator or commodity trading advisor (whether registered or exempt from registration)
- ☐ (7) futures commission merchant
- ☐ (8) banking or thrift institution
- ☐ (9) trust company
- ☐ (10) accountant or accounting firm
- ☐ (11) lawyer or law firm
- ☐ (12) insurance company or agency
- ☐ (13) pension consultant
- ☐ (14) real estate broker or dealer
- ☐ (15) sponsor or syndicator of limited partnerships (or equivalent), excluding pooled investment vehicles
- ☐ (16) sponsor, general partner, managing member (or equivalent) of pooled investment vehicles

*Note that Item 7.A. should not be used to disclose that some of your employees perform investment advisory functions or are registered representatives of a broker-dealer. The number of your firm's employees who perform investment advisory functions should be disclosed under Item 5.B.(1). The number of your firm's employees who are registered representatives of a broker-dealer should be disclosed under Item 5.B.(2).*

*Note that if you are filing an umbrella registration, you should not check Item 7.A.(2) with respect to your relying advisers, and you do not have to complete Section 7.A. in Schedule D for your relying advisers. You should complete a Schedule R for each relying adviser.*

*For each related person, including foreign affiliates that may not be registered or required to be registered in the United States, complete Section 7.A. of Schedule D.*

*You do not need to complete Section 7.A. of Schedule D for any related person if: (1) you have no business dealings with the related person in connection with advisory services you provide to your clients; (2) you do not conduct shared operations with the related person; (3) you do not refer clients or business to the related person, and the related person does not refer prospective clients or business to you; (4) you do not share supervised persons or premises with the related person; and (5) you have no reason to believe that your relationship with the related person otherwise creates a conflict of interest with your clients.*

*You must complete Section 7.A. of Schedule D for each related person acting as qualified custodian in connection with advisory services you provide to your clients (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)), regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.*

**SECTION 7.A. Financial Industry Affiliations**

No Information Filed

**Item 7 Private Fund Reporting**

**Yes No**

- B. Are you an adviser to any *private fund*?

☐ ☒

*If "yes," then for each private fund that you advise, you must complete a Section 7.B.(1) of Schedule D, except in certain circumstances described in the next sentence and in Instruction 6 of the Instructions to Part 1A. If you are registered or applying for registration with the SEC or reporting as an SEC exempt reporting adviser, and another SEC-registered adviser or SEC exempt*

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reporting adviser reports this information with respect to any such private fund in Section 7.B.(1) of Schedule D of its Form ADV (e.g., if you are a subadviser), do not complete Section 7.B.(1) of Schedule D with respect to that private fund. You must, instead, complete Section 7.B.(2) of Schedule D.

*In either case, if you seek to preserve the anonymity of a private fund client by maintaining its identity in your books and records in numerical or alphabetical code, or similar designation, pursuant to rule 204-2(d), you may identify the private fund in Section 7.B.(1) or 7.B.(2) of Schedule D using the same code or designation in place of the fund's name.*

**SECTION 7.B.(1) Private Fund Reporting**

No Information Filed

**SECTION 7.B.(2) Private Fund Reporting**

No Information Filed

**Item 8 Participation or Interest in *Client* Transactions**

In this Item, we request information about your participation and interest in your *clients'* transactions. This information identifies additional areas in which conflicts of interest may occur between you and your *clients*. Newly-formed advisers should base responses to these questions on the types of participation and interest that you expect to engage in during the next year.

Like Item 7, Item 8 requires you to provide information about you and your *related persons*, including foreign affiliates.

**Proprietary Interest in *Client* Transactions**

- |  | <b>Yes</b>                       | <b>No</b>                        |
|--|----------------------------------|----------------------------------|
| A. Do you or any <i>related person</i> :   |                                  |                                  |
| (1) buy securities for yourself from advisory <i>clients</i> , or sell securities you own to advisory <i>clients</i> (principal transactions)?   | <input type="radio"/>            | <input checked="" type="radio"/> |
| (2) buy or sell for yourself securities (other than shares of mutual funds) that you also recommend to advisory <i>clients</i> ?   | <input checked="" type="radio"/> | <input type="radio"/>            |
| (3) recommend securities (or other investment products) to advisory <i>clients</i> in which you or any <i>related person</i> has some other proprietary (ownership) interest (other than those mentioned in Items 8.A.(1) or (2))? | <input type="radio"/>            | <input checked="" type="radio"/> |

**Sales Interest in *Client* Transactions**

- |  | <b>Yes</b>            | <b>No</b>                        |
|--|-----------------------|----------------------------------|
| B. Do you or any <i>related person</i> :   |                       |                                  |
| (1) as a broker-dealer or registered representative of a broker-dealer, execute securities trades for brokerage customers in which advisory <i>client</i> securities are sold to or bought from the brokerage customer (agency cross transactions)?        | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) recommend to advisory <i>clients</i> , or act as a purchaser representative for advisory <i>clients</i> with respect to, the purchase of securities for which you or any <i>related person</i> serves as underwriter or general or managing partner?   | <input type="radio"/> | <input checked="" type="radio"/> |
| (3) recommend purchase or sale of securities to advisory <i>clients</i> for which you or any <i>related person</i> has any other sales interest (other than the receipt of sales commissions as a broker or registered representative of a broker-dealer)? | <input type="radio"/> | <input checked="" type="radio"/> |

**Investment or Brokerage Discretion**

- |   | <b>Yes</b>                       | <b>No</b>                        |
|---|----------------------------------|----------------------------------|
| C. Do you or any <i>related person</i> have <i>discretionary authority</i> to determine the:  |                                  |                                  |
| (1) securities to be bought or sold for a <i>client's</i> account?  | <input checked="" type="radio"/> | <input type="radio"/>            |
| (2) amount of securities to be bought or sold for a <i>client's</i> account?  | <input checked="" type="radio"/> | <input type="radio"/>            |
| (3) broker or dealer to be used for a purchase or sale of securities for a <i>client's</i> account?   | <input checked="" type="radio"/> | <input type="radio"/>            |
| (4) commission rates to be paid to a broker or dealer for a <i>client's</i> securities transactions?  | <input checked="" type="radio"/> | <input type="radio"/>            |
| D. If you answer "yes" to C.(3) above, are any of the brokers or dealers <i>related persons</i> ?   | <input type="radio"/>            | <input checked="" type="radio"/> |
| E. Do you or any <i>related person</i> recommend brokers or dealers to <i>clients</i> ?   | <input checked="" type="radio"/> | <input type="radio"/>            |
| F. If you answer "yes" to E. above, are any of the brokers or dealers <i>related persons</i> ?  | <input type="radio"/>            | <input checked="" type="radio"/> |
| G. (1) Do you or any <i>related person</i> receive research or other products or services other than execution from a broker-dealer or a third party ("soft dollar benefits") in connection with <i>client</i> securities transactions?                               | <input type="radio"/>            | <input checked="" type="radio"/> |
| (2) If "yes" to G.(1) above, are all the "soft dollar benefits" you or any <i>related persons</i> receive eligible "research or brokerage services" under section 28(e) of the Securities Exchange Act of 1934?   | <input type="radio"/>            | <input type="radio"/>            |
| H. (1) Do you or any <i>related person</i> , directly or indirectly, compensate any <i>person</i> that is not an <i>employee</i> for <i>client</i> referrals?   | <input type="radio"/>            | <input checked="" type="radio"/> |
| (2) Do you or any <i>related person</i> , directly or indirectly, provide any <i>employee</i> compensation that is specifically related to obtaining <i>clients</i> for the firm (cash or non-cash compensation in addition to the <i>employee's</i> regular salary)? | <input checked="" type="radio"/> | <input type="radio"/>            |
| I. Do you or any <i>related person</i> , including any <i>employee</i> , directly or indirectly, receive compensation from any <i>person</i> (other than you or any <i>related person</i> ) for <i>client</i> referrals?  | <input type="radio"/>            | <input checked="" type="radio"/> |

In your response to Item 8.I., do not include the regular salary you pay to an employee.

In responding to Items 8.H. and 8.I., consider all cash and non-cash compensation that you or a related person gave to (in

answering Item 8.H.) or received from (in answering Item 8.I.) any person in exchange for client referrals, including any bonus that is based, at least in part, on the number or amount of client referrals.

**Item 9 Custody**

In this Item, we ask you whether you or a *related person* has *custody of client* (other than *clients* that are investment companies registered under the Investment Company Act of 1940) assets and about your custodial practices.

- A. (1) Do you have *custody* of any advisory *clients*': **Yes No**
- (a) cash or bank accounts? ☐ ☒
- (b) securities? ☐ ☒

*If you are registering or registered with the SEC, answer "No" to Item 9.A.(1)(a) and (b) if you have custody solely because (i) you deduct your advisory fees directly from your clients' accounts, or (ii) a related person has custody of client assets in connection with advisory services you provide to clients, but you have overcome the presumption that you are not operationally independent (pursuant to Advisers Act rule 206(4)-2(d)(5)) from the related person.*

- (2) If you checked "yes" to Item 9.A.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which you have *custody*:

U.S. Dollar Amount	Total Number of <i>Clients</i>
(a) \$	(b)

*If you are registering or registered with the SEC and you have custody solely because you deduct your advisory fees directly from your clients' accounts, do not include the amount of those assets and the number of those clients in your response to Item 9.A.(2). If your related person has custody of client assets in connection with advisory services you provide to clients, do not include the amount of those assets and number of those clients in your response to 9.A.(2). Instead, include that information in your response to Item 9.B.(2).*

- B. (1) In connection with advisory services you provide to *clients*, do any of your *related persons* have *custody* of any of your advisory *clients*': **Yes No**
- (a) cash or bank accounts? ☐ ☒
- (b) securities? ☐ ☒

*You are required to answer this item regardless of how you answered Item 9.A.(1)(a) or (b).*

- (2) If you checked "yes" to Item 9.B.(1)(a) or (b), what is the approximate amount of *client* funds and securities and total number of *clients* for which your *related persons* have *custody*:

U.S. Dollar Amount	Total Number of <i>Clients</i>
(a) \$	(b)

- C. If you or your *related persons* have *custody* of *client* funds or securities in connection with advisory services you provide to *clients*, check all the following that apply:
- (1) A qualified custodian(s) sends account statements at least quarterly to the investors in the pooled investment vehicle(s) you manage. ☐
- (2) An *independent public accountant* audits annually the pooled investment vehicle(s) that you manage and the audited financial statements are distributed to the investors in the pools. ☐
- (3) An *independent public accountant* conducts an annual surprise examination of *client* funds and securities. ☐
- (4) An *independent public accountant* prepares an internal control report with respect to custodial services when you or your *related persons* are qualified custodians for *client* funds and securities. ☐

*If you checked Item 9.C.(2), C.(3) or C.(4), list in Section 9.C. of Schedule D the accountants that are engaged to perform the audit or examination or prepare an internal control report. (If you checked Item 9.C.(2), you do not have to list auditor information in Section 9.C. of Schedule D if you already provided this information with respect to the private funds you advise in Section 7.B.(1) of Schedule D).*

- D. Do you or your *related person(s)* act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*? **Yes No**
- (1) you act as a qualified custodian





(2) your *related person(s)* act as qualified custodian(s)

*If you checked "yes" to Item 9.D.(2), all related persons that act as qualified custodians (other than any mutual fund transfer agent pursuant to rule 206(4)-2(b)(1)) must be identified in Section 7.A. of Schedule D, regardless of whether you have determined the related person to be operationally independent under rule 206(4)-2 of the Advisers Act.*

- E. If you are filing your *annual updating amendment* and you were subject to a surprise examination by an *independent public accountant* during your last fiscal year, provide the date (MM/YYYY) the examination commenced:
- F. If you or your *related persons* have *custody* of *client* funds or securities, how many *persons*, including, but not limited to, you and your *related persons*, act as qualified custodians for your *clients* in connection with advisory services you provide to *clients*?
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#### **SECTION 9.C. Independent Public Accountant**

No Information Filed

**Item 10 Control Persons**

In this Item, we ask you to identify every *person* that, directly or indirectly, *controls* you. If you are filing an *umbrella registration*, the information in Item 10 should be provided for the *filing adviser* only.

If you are submitting an initial application or report, you must complete Schedule A and Schedule B. Schedule A asks for information about your direct owners and executive officers. Schedule B asks for information about your indirect owners. If this is an amendment and you are updating information you reported on either Schedule A or Schedule B (or both) that you filed with your initial application or report, you must complete Schedule C.

**Yes No**

- A. Does any *person* not named in Item 1.A. or Schedules A, B, or C, directly or indirectly, *control* your management or policies? ☐ ☒

*If yes, complete Section 10.A. of Schedule D.*

- B. If any *person* named in Schedules A, B, or C or in Section 10.A. of Schedule D is a public reporting company under Sections 12 or 15(d) of the Securities Exchange Act of 1934, please complete Section 10.B. of Schedule D.

**SECTION 10.A. Control Persons**

No Information Filed

**SECTION 10.B. Control Person Public Reporting Companies**

No Information Filed

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**Item 11 Disclosure Information**

In this Item, we ask for information about your disciplinary history and the disciplinary history of all your *advisory affiliates*. We use this information to determine whether to grant your application for registration, to decide whether to revoke your registration or to place limitations on your activities as an investment adviser, and to identify potential problem areas to focus on during our on-site examinations. One event may result in "yes" answers to more than one of the questions below. In accordance with General Instruction 5 to Form ADV, "you" and "your" include the *filing adviser* and all *relying advisers* under an *umbrella registration*.

Your *advisory affiliates* are: (1) all of your current *employees* (other than *employees* performing only clerical, administrative, support or similar functions); (2) all of your officers, partners, or directors (or any *person* performing similar functions); and (3) all *persons* directly or indirectly *controlling* you or *controlled* by you. If you are a "separately identifiable department or division" (SID) of a bank, see the Glossary of Terms to determine who your *advisory affiliates* are.

*If you are registered or registering with the SEC or if you are an exempt reporting adviser, you may limit your disclosure of any event listed in Item 11 to ten years following the date of the event. If you are registered or registering with a state, you must respond to the questions as posed; you may, therefore, limit your disclosure to ten years following the date of an event only in responding to Items 11.A.(1), 11.A.(2), 11.B.(1), 11.B.(2), 11.D.(4), and 11.H.(1)(a). For purposes of calculating this ten-year period, the date of an event is the date the final order, judgment, or decree was entered, or the date any rights of appeal from preliminary orders, judgments, or decrees lapsed.*

You must complete the appropriate Disclosure Reporting Page ("DRP") for "yes" answers to the questions in this Item 11.

	<b>Yes</b>	<b>No</b>
Do any of the events below involve you or any of your <i>supervised persons</i> ?	<input type="radio"/>	<input checked="" type="radio"/>

For "yes" answers to the following questions, complete a Criminal Action DRP:

A.	In the past ten years, have you or any <i>advisory affiliate</i> :		<b>Yes</b>	<b>No</b>
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to any <i>felony</i> ?	<input type="radio"/>		<input checked="" type="radio"/>
	(2) been <i>charged</i> with any <i>felony</i> ?	<input type="radio"/>		<input checked="" type="radio"/>

*If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.A.(2) to charges that are currently pending.*

B.	In the past ten years, have you or any <i>advisory affiliate</i> :		<b>Yes</b>	<b>No</b>
	(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign, or military court to a <i>misdemeanor</i> involving: investments or an <i>investment-related</i> business, or any fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	<input type="radio"/>		<input checked="" type="radio"/>
	(2) been <i>charged</i> with a <i>misdemeanor</i> listed in Item 11.B.(1)?	<input type="radio"/>		<input checked="" type="radio"/>

*If you are registered or registering with the SEC, or if you are reporting as an exempt reporting adviser, you may limit your response to Item 11.B.(2) to charges that are currently pending.*

For "yes" answers to the following questions, complete a Regulatory Action DRP:

C.	Has the SEC or the Commodity Futures Trading Commission (CFTC) ever:		<b>Yes</b>	<b>No</b>
	(1) <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission?	<input type="radio"/>		<input checked="" type="radio"/>
	(2) <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of SEC or CFTC regulations or statutes?	<input type="radio"/>		<input checked="" type="radio"/>
	(3) <i>found</i> you or any <i>advisory affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	<input type="radio"/>		<input checked="" type="radio"/>
	(4) entered an <i>order</i> against you or any <i>advisory affiliate</i> in connection with <i>investment-related</i> activity?	<input type="radio"/>		<input checked="" type="radio"/>
	(5) imposed a civil money penalty on you or any <i>advisory affiliate</i> , or <i>ordered</i> you or any <i>advisory affiliate</i> to cease and desist from any activity?	<input type="radio"/>		<input checked="" type="radio"/>
D.	Has any other federal regulatory agency, any state regulatory agency, or any <i>foreign financial regulatory authority</i> :			
	(1) ever <i>found</i> you or any <i>advisory affiliate</i> to have made a false statement or omission, or been dishonest, unfair, or unethical?	<input type="radio"/>		<input checked="" type="radio"/>
	(2) ever <i>found</i> you or any <i>advisory affiliate</i> to have been <i>involved</i> in a violation of <i>investment-related</i> regulations or	<input type="radio"/>		<input checked="" type="radio"/>

- (3) ever *found* you or any *advisory affiliate* to have been a cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted? ☐ ☒
- (4) in the past ten years, entered an *order* against you or any *advisory affiliate* in connection with an *investment-related* activity? ☐ ☒
- (5) ever denied, suspended, or revoked your or any *advisory affiliate's* registration or license, or otherwise prevented you or any *advisory affiliate*, by *order*, from associating with an *investment-related* business or restricted your or any *advisory affiliate's* activity? ☐ ☒
- E. Has any *self-regulatory organization* or commodities exchange ever:
- (1) *found* you or any *advisory affiliate* to have made a false statement or omission? ☐ ☒
- (2) *found* you or any *advisory affiliate* to have been *involved* in a violation of its rules (other than a violation designated as a "*minor rule violation*" under a plan approved by the SEC)? ☐ ☒
- (3) *found* you or any *advisory affiliate* to have been the cause of an *investment-related* business having its authorization to do business denied, suspended, revoked, or restricted? ☐ ☒
- (4) disciplined you or any *advisory affiliate* by expelling or suspending you or the *advisory affiliate* from membership, barring or suspending you or the *advisory affiliate* from association with other members, or otherwise restricting your or the *advisory affiliate's* activities? ☐ ☒
- F. Has an authorization to act as an attorney, accountant, or federal contractor granted to you or any *advisory affiliate* ever been revoked or suspended? ☐ ☒
- G. Are you or any *advisory affiliate* now the subject of any regulatory *proceeding* that could result in a "yes" answer to any part of Item 11.C., 11.D., or 11.E.? ☐ ☒

For "yes" answers to the following questions, complete a Civil Judicial Action DRP:

- |  | Yes                   | No                               |
|--|-----------------------|----------------------------------|
| H. (1) Has any domestic or foreign court:  |                       |                                  |
| (a) in the past ten years, <i>enjoined</i> you or any <i>advisory affiliate</i> in connection with any <i>investment-related</i> activity?   | <input type="radio"/> | <input checked="" type="radio"/> |
| (b) ever <i>found</i> that you or any <i>advisory affiliate</i> were <i>involved</i> in a violation of <i>investment-related</i> statutes or regulations?  | <input type="radio"/> | <input checked="" type="radio"/> |
| (c) ever dismissed, pursuant to a settlement agreement, an <i>investment-related</i> civil action brought against you or any <i>advisory affiliate</i> by a state or <i>foreign financial regulatory authority</i> ? | <input type="radio"/> | <input checked="" type="radio"/> |
| (2) Are you or any <i>advisory affiliate</i> now the subject of any civil <i>proceeding</i> that could result in a "yes" answer to any part of Item 11.H.(1)?  | <input type="radio"/> | <input checked="" type="radio"/> |

**Item 12 Small Businesses**

The SEC is required by the Regulatory Flexibility Act to consider the effect of its regulations on small entities. In order to do this, we need to determine whether you meet the definition of "small business" or "small organization" under rule 0-7.

Answer this Item 12 only if you are registered or registering with the SEC **and** you indicated in response to Item 5.F.(2)(c) that you have regulatory assets under management of less than \$25 million. You are not required to answer this Item 12 if you are filing for initial registration as a state adviser, amending a current state registration, or switching from SEC to state registration.

For purposes of this Item 12 only:

- Total Assets refers to the total assets of a firm, rather than the assets managed on behalf of *clients*. In determining your or another *person's* total assets, you may use the total assets shown on a current balance sheet (but use total assets reported on a consolidated balance sheet with subsidiaries included, if that amount is larger).
- *Control* means the power to direct or cause the direction of the management or policies of a *person*, whether through ownership of securities, by contract, or otherwise. Any *person* that directly or indirectly has the right to vote 25 percent or more of the voting securities, or is entitled to 25 percent or more of the profits, of another *person* is presumed to *control* the other *person*.

**Yes No**

A. Did you have total assets of \$5 million or more on the last day of your most recent fiscal year?

☐ ☐

If "yes," you do not need to answer Items 12.B. and 12.C.

B. Do you:

(1) *control* another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?

☐ ☐

(2) *control* another *person* (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?

☐ ☐

C. Are you:

(1) *controlled* by or under common *control* with another investment adviser that had regulatory assets under management (calculated in response to Item 5.F.(2)(c) of Form ADV) of \$25 million or more on the last day of its most recent fiscal year?

☐ ☐

(2) *controlled* by or under common *control* with another *person* (other than a natural person) that had total assets of \$5 million or more on the last day of its most recent fiscal year?

☐ ☐

### Direct Owners and Executive Officers

1. Complete Schedule A only if you are submitting an initial application or report. Schedule A asks for information about your direct owners and executive officers. Use Schedule C to amend this information.
2. Direct Owners and Executive Officers. List below the names of:
  - (a) each Chief Executive Officer, Chief Financial Officer, Chief Operations Officer, Chief Legal Officer, Chief Compliance Officer (Chief Compliance Officer is required if you are registered or applying for registration and cannot be more than one individual), director, and any other individuals with similar status or functions;
  - (b) if you are organized as a corporation, each shareholder that is a direct owner of 5% or more of a class of your voting securities, unless you are a public reporting company (a company subject to Section 12 or 15(d) of the Exchange Act); Direct owners include any *person* that owns, beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 5% or more of a class of your voting securities. For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.
  - (c) if you are organized as a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 5% or more of your capital;
  - (d) in the case of a trust that directly owns 5% or more of a class of your voting securities, or that has the right to receive upon dissolution, or has contributed, 5% or more of your capital, the trust and each trustee; and
  - (e) if you are organized as a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 5% or more of your capital, and (ii) if managed by elected managers, all elected managers.
3. Do you have any indirect owners to be reported on Schedule B? ☒ Yes ☐ No
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner or executive officer is an individual.
5. Complete the Title or Status column by entering board/management titles; status as partner, trustee, sole proprietor, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are: NA - less than 5% B - 10% but less than 25% D - 50% but less than 75%  
A - 5% but less than 10% C - 25% but less than 50% E - 75% or more
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.  
(b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.  
(c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Title or Status	Date Title or Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
CASELL, MARTIN, DAYLE	I	CEO, CIO & PRESIDENT	03/2003	C	Y	N	4330905
CHANDLER, MARY, CATHERINE	I	CHAIRMAN OF THE BOARD	07/1993	C	Y	N	2276868
DRAGOO, NICOLE, MARIE	I	CHIEF COMPLIANCE OFFICER & CHIEF OPERATING OFFICER	01/2008	NA	Y	N	4263078
SCHMITT, JAYSON	I	EXECUTIVE VICE PRESIDENT, PORTFOLIO MANAGER	02/2004	NA	Y	N	4892847
PIORKOWSKI, TED, JAMES	I	SENIOR VICE PRESIDENT, SENIOR PORTFOLIO MANAGER	01/2007	NA	Y	N	1857510
CHANDLER ASSET MANAGEMENT, INC. EMPLOYEE STOCK OWNERSHIP PLAN & TRUST	DE	SHAREHOLDER	07/2017	C	Y	N	81-2142236

**Schedule B****Indirect Owners**

1. Complete Schedule B only if you are submitting an initial application or report. Schedule B asks for information about your indirect owners; you must first complete Schedule A, which asks for information about your direct owners. Use Schedule C to amend this information.
2. Indirect Owners. With respect to each owner listed on Schedule A (except individual owners), list below:
  - (a) in the case of an owner that is a corporation, each of its shareholders that beneficially owns, has the right to vote, or has the power to sell or direct the sale of, 25% or more of a class of a voting security of that corporation;

For purposes of this Schedule, a *person* beneficially owns any securities: (i) owned by his/her child, stepchild, grandchild, parent, stepparent, grandparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law, sharing the same residence; or (ii) that he/she has the right to acquire, within 60 days, through the exercise of any option, warrant, or right to purchase the security.

  - (b) in the case of an owner that is a partnership, all general partners and those limited and special partners that have the right to receive upon dissolution, or have contributed, 25% or more of the partnership's capital;
  - (c) in the case of an owner that is a trust, the trust and each trustee; and
  - (d) in the case of an owner that is a limited liability company ("LLC"), (i) those members that have the right to receive upon dissolution, or have contributed, 25% or more of the LLC's capital, and (ii) if managed by elected managers, all elected managers.
3. Continue up the chain of ownership listing all 25% owners at each level. Once a public reporting company (a company subject to Sections 12 or 15(d) of the Exchange Act) is reached, no further ownership information need be given.
4. In the DE/FE/I column below, enter "DE" if the owner is a domestic entity, "FE" if the owner is an entity incorporated or domiciled in a foreign country, or "I" if the owner is an individual.
5. Complete the Status column by entering the owner's status as partner, trustee, elected manager, shareholder, or member; and for shareholders or members, the class of securities owned (if more than one is issued).
6. Ownership codes are: C - 25% but less than 50% E - 75% or more  
D - 50% but less than 75% F - Other (general partner, trustee, or elected manager)
7. (a) In the *Control Person* column, enter "Yes" if the *person* has *control* as defined in the Glossary of Terms to Form ADV, and enter "No" if the *person* does not have *control*. Note that under this definition, most executive officers and all 25% owners, general partners, elected managers, and trustees are *control persons*.  
(b) In the PR column, enter "PR" if the owner is a public reporting company under Sections 12 or 15(d) of the Exchange Act.  
(c) Complete each column.

FULL LEGAL NAME (Individuals: Last Name, First Name, Middle Name)	DE/FE/I	Entity in Which Interest is Owned	Status	Date Status Acquired MM/YYYY	Ownership Code	Control Person	PR	CRD No. If None: S.S. No. and Date of Birth, IRS Tax No. or Employer ID No.
CASELL, MARTIN, DAYLE	I	CHANDLER ASSET MANAGEMENT, INC. EMPLOYEE STOCK OWNERSHIP PLAN & TRUST	TRUSTEE	07/2017	C	Y	N	4330905



**Schedule D - Miscellaneous**

You may use the space below to explain a response to an Item or to provide any other information.

Chandler's soft dollar policy prohibits us from entering into third party soft dollar arrangements, please see our Part 2A for additional disclosures.

**Schedule R**

No Information Filed

**DRP Pages**

**CRIMINAL DISCLOSURE REPORTING PAGE (ADV)**

No Information Filed

**REGULATORY ACTION DISCLOSURE REPORTING PAGE (ADV)**

No Information Filed

**CIVIL JUDICIAL ACTION DISCLOSURE REPORTING PAGE (ADV)**

No Information Filed

**Part 2****Exemption from brochure delivery requirements for SEC-registered advisers**

SEC rules exempt SEC-registered advisers from delivering a firm brochure to some kinds of clients. If these exemptions excuse you from delivering a brochure to *all* of your advisory clients, you do not have to prepare a brochure.

**Yes No**

Are you exempt from delivering a brochure to all of your clients under these rules?

☐ ☒

*If no, complete the ADV Part 2 filing below.*

Amend, retire or file new brochures:

CRS	Type(s)	Affiliate Info	Retire
	Investment Adviser		

**DOMESTIC INVESTMENT ADVISER EXECUTION PAGE**

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

**Appointment of Agent for Service of Process**

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint the Secretary of State or other legally designated officer, of the state in which you maintain your *principal office and place of business* and any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding*, or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of the state in which you maintain your *principal office and place of business* or of any state in which you are submitting a *notice filing*.

**Signature**

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

MARTIN CASSELL

Printed Name:

MARTIN CASSELL

Adviser CRD Number:

107287

Date: MM/DD/YYYY

06/15/2020

Title:

CEO

**NON-RESIDENT INVESTMENT ADVISER EXECUTION PAGE**

You must complete the following Execution Page to Form ADV. This execution page must be signed and attached to your initial submission of Form ADV to the SEC and all amendments.

**1. Appointment of Agent for Service of Process**

By signing this Form ADV Execution Page, you, the undersigned adviser, irrevocably appoint each of the Secretary of the SEC, and the Secretary of State or other legally designated officer, of any other state in which you are submitting a *notice filing*, as your agents to receive service, and agree that such *persons* may accept service on your behalf, of any notice, subpoena, summons, *order* instituting *proceedings*, demand for arbitration, or other process or papers, and you further agree that such service may be made by registered or certified mail, in any federal or state action, administrative *proceeding* or arbitration brought against you in any place subject to the jurisdiction of the United States, if the action, *proceeding* or arbitration (a) arises out of any activity in connection with your investment advisory business that is subject to the jurisdiction of the United States, and (b) is *founded*, directly or indirectly, upon the provisions of: (i) the Securities Act of 1933, the Securities Exchange Act of 1934, the Trust Indenture Act of 1939, the Investment Company Act of 1940, or the Investment Advisers Act of 1940, or any rule or regulation under any of these acts, or (ii) the laws of any state in which you are submitting a *notice filing*.

**2. Appointment and Consent: Effect on Partnerships**

If you are organized as a partnership, this irrevocable power of attorney and consent to service of process will continue in effect if

any partner withdraws from or is admitted to the partnership, provided that the admission or withdrawal does not create a new partnership. If the partnership dissolves, this irrevocable power of attorney and consent shall be in effect for any action brought against you or any of your former partners.

### 3. *Non-Resident* Investment Adviser Undertaking Regarding Books and Records

By signing this Form ADV, you also agree to provide, at your own expense, to the U.S. Securities and Exchange Commission at its principal office in Washington D.C., at any Regional or District Office of the Commission, or at any one of its offices in the United States, as specified by the Commission, correct, current, and complete copies of any or all records that you are required to maintain under Rule 204-2 under the Investment Advisers Act of 1940. This undertaking shall be binding upon you, your heirs, successors and assigns, and any *person* subject to your written irrevocable consents or powers of attorney or any of your general partners and *managing agents*.

#### Signature

I, the undersigned, sign this Form ADV on behalf of, and with the authority of, the *non-resident* investment adviser. The investment adviser and I both certify, under penalty of perjury under the laws of the United States of America, that the information and statements made in this ADV, including exhibits and any other information submitted, are true and correct, and that I am signing this Form ADV Execution Page as a free and voluntary act.

I certify that the adviser's books and records will be preserved and available for inspection as required by law. Finally, I authorize any *person* having *custody* or possession of these books and records to make them available to federal and state regulatory representatives.

Signature:

Date: MM/DD/YYYY

Printed Name:

Title:

Adviser *CRD* Number:

107287



## **Part 2A of Form ADV: Firm Brochure**

### **Chandler Asset Management, Inc.**

6225 Lusk Boulevard  
San Diego, CA 92121

Telephone: 858-546-3737  
Email: [Compliance@chandlerasset.com](mailto:Compliance@chandlerasset.com)  
Web Address: [www.chandlerasset.com](http://www.chandlerasset.com)

**March 9, 2020**

This disclosure brochure (the "Brochure") provides information about the qualifications and business practices of Chandler Asset Management, Inc. ("Chandler"). If you have any questions about the contents of this Brochure, please contact us at 858-546-3737 or [Compliance@chandlerasset.com](mailto:Compliance@chandlerasset.com). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Registration with the Securities and Exchange Commission does not imply any level of skill or training.

Additional information about Chandler and its investment adviser representatives is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can search this site by name or by a unique identifying number, known as a CRD number. Our firm's CRD number is 107287.

## ITEM 2 MATERIAL CHANGES

This Firm Brochure, dated 03/09/2020, provides you with a summary of Chandler's advisory services and fees, professionals, certain business practices and policies, as well as actual or potential conflicts of interest, among other things. This item (Item 2) is used to provide our clients with a summary of new and/or updated information; we will inform you of the revision(s) based on the nature of the information as follows.

1. *Annual Update*: We are required to update certain information at least annually, within 90 days of our firm's fiscal year end ("FYE") of December 31. We will provide you with either a summary of the revised information with an offer to deliver the full revised Brochure within 120 days of our FYE or we will provide you with our revised Brochure that will include a summary of those changes in this Item.
2. *Material Changes*: Should a material change in our operations occur, depending on its nature we will promptly communicate this change to clients (and it will be summarized in this Item). "Material changes" requiring prompt notification will include changes of ownership or control; location or disciplinary proceedings. We may also advise you of other changes based on the nature of the updated information.

The following summarizes new or revised disclosures based on information previously provided in our Firm Brochure dated 03/05/2019.

*Items 4, 5, 8, 12, and 13* – Changed name of Global Asset Allocation Strategy to Multi Asset Class Strategy effective 3/31/19.

*Item 4 – Advisory Services* – Revised Item 4E to reflect regulatory assets under management as of December 31, 2019.

***Clients and prospective clients are strongly encouraged to review this Brochure very carefully.***

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<b>ITEM 4</b>	<b>ADVISORY BUSINESS</b>
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**ITEM 4A: FIRM OVERVIEW**

Chandler Asset Management, Inc. ("Chandler") is an SEC-registered investment adviser and employee-owned business enterprise with its principal place of business located in San Diego, California. Since 1988, Chandler has provided fixed income investment management services to the public sector, as well as to hospitals, foundations, endowments, individuals and corporations.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Chandler Asset Management, Inc. Employee Stock Ownership Plan ("ESOP")
- Mary Catherine (Kay) Chandler, Chairman of the Board
- Martin Dayle Cassell, CEO/CIO

**ITEM 4B: TYPES OF ADVISORY SERVICES**

Chandler offers the following advisory services, where appropriate, to certain institutional clients such as public agencies, hospitals and healthcare institutions, corporations or other business entities, foundations and endowments, pension and profit sharing plans, higher education institutions, and non-institutional clients, such as individuals, high net worth individuals, trusts, estates and charitable organizations. The portfolio management services are offered to clients directly, and through wrap fee programs, sub-advisory relationships, and dual contract sponsored programs.

**FIXED INCOME PORTFOLIO MANAGEMENT**

Chandler specializes in fixed income portfolio management, utilizing a variety of investments, such as corporate debt securities (notes and bonds), municipal bonds, U.S. Government Treasury bonds, Government Sponsored Enterprise debt securities (agencies), mortgage backed securities, asset-backed securities and money market securities, i.e., commercial paper. Please refer to Item 8 for further information on our method of analysis and risks associated with this strategy.

**MULTI ASSET CLASS PORTFOLIO MANAGEMENT**

Chandler also offers a Multi Asset Class strategy to clients seeking to attain exposure to a variety of global equity, fixed income and other asset classes through investment in indexed or actively managed mutual funds and exchange-traded funds (ETFs). Please refer to Item 8 for further information on our method of analysis and risks associated with this strategy.

**CONSULTING SERVICES**

Chandler also provides more focused investment advice to clients. This advice can pertain to areas that clients consider a concern, such as analysis of a client's existing portfolio, delivery of a report or periodic reports of performance and recommended rebalancing of assets, or a review of the client's investment policy. We also provide specific consultation and administrative services regarding investment and financial concerns of the client.

Consulting recommendations are not limited to any specific product or service offered by a broker-dealer.

**ITEM 4C: TAILORING ADVISORY SERVICES OFFERED DIRECTLY TO CLIENTS**

At the beginning of the client relationship, we have discussions with clients to determine their overall investment goals in order to develop a specific investment policy for each client and confirm that the selected strategy meets their current needs. During our information gathering process, we review the client's individual objectives, time horizons, risk tolerance, liquidity needs and any investment restrictions they may want to place on the assets in their account. As appropriate, we also review and discuss a client's prior investment history, and any other

relevant issues. Once these reviews and discussions take place, the client enters into a written agreement directly with Chandler for the management of certain assets.

Clients are responsible for informing us of any changes to their guidelines, individual needs and/or restrictions and should do so promptly upon such change. We do not assume any responsibility for the accuracy of the information provided by the client.

Generally, we manage clients' advisory accounts on a discretionary basis, but will manage a client's account on a non-discretionary basis, if requested by a client. Please refer to Item 16 for further information on our discretionary authority of client accounts.

In addition to the types of securities utilized by Chandler for its Fixed Income and Multi Asset Class advisory services outlined above, we also provide advice on or manage other investments for clients, particularly when a client already has securities in his/her portfolio at the time the client opens an account with Chandler. These generally include, but are not be limited to:

- Exchange-listed securities
- Securities traded over-the-counter
- Certificates of deposit

Some types of investments involve certain additional degrees of risk; therefore, they will only be implemented or recommended when consistent with the client's stated investment goals, tolerance for risk, liquidity and suitability requirements. Please refer to Item 8 for further information on the risks associated with investments made in clients' accounts.

Clients will retain individual ownership of all securities at all times through their selected custodian.

### **GUIDED PORTFOLIO STRATEGIES ("GPS")**

The GPS program provides fixed income portfolio management for public agency clients who cannot meet the institutional minimum required for Chandler's full-service customized portfolio management. GPS is a streamlined service model whereby the client receives fixed income portfolio management in a separate account custodied at a qualified third-party custodian. Clients may choose between two of Chandler's established, short duration investment strategies developed to meet the investment needs of municipal investors. Chandler will manage the portfolios in compliance with State or Government code sections related to permitted investments for municipalities and will not accommodate additional client restrictions or requests for customizations to the portfolio or our standard reporting packages. Services are limited to the scope defined in the client Agreement.

To be eligible for this program, the client must have a minimum of \$2 million in investable assets. Please refer to Item 5 for program fees.

### **ITEM 4D: SERVICES OFFERED THROUGH WRAP FEE PROGRAMS, SUB-ADVISORY ARRANGEMENTS AND DUAL CONTRACT SPONSORED PROGRAMS**

Chandler participates as an investment manager in selected wrap fee programs ("Wrap Programs"). Generally, under these programs a client enters into an agreement with the wrap program sponsor to provide the following services to such clients ("Wrap Clients"): a) assisting the Wrap Client in determining which investment strategy and investment manager best meet their goals and objectives, b) on-going monitoring of account performance, c) custodial services, and d) execution of account transactions. These services and the services provided by the investment manager are generally provided for one all-inclusive fee ("Wrap Fee"). From the Wrap Fee, the wrap program sponsor pays the investment manager (for example Chandler) for their services.

Currently, Chandler participates as an investment manager in the following Wrap Programs:

- Managed Accounts Select Program sponsored by Charles Schwab Corporation ("Schwab")
- Separately Managed Accounts ("SMA") Program sponsored by Envestnet Asset Management, Inc. ("Envestnet")
- Unified Managed Accounts ("UMA") Program sponsored by Envestnet.

For more details on these specific programs, clients should review the respective sponsor's Wrap Fee Program Brochure prior to investing.

In each of these programs, a representative of the program sponsor or an independent financial advisor will work with the Wrap Client to complete an investment questionnaire or other investment objective documentation and determine the appropriate investment strategy and manager. While Chandler is not responsible for client suitability for the Wrap Program, we will perform a general review of the Wrap Client's investment objective documentation, if provided by the wrap sponsor, to help us ensure that our strategy selected by the Wrap Client appears suitable. Participation in these wrap programs is subject to account minimums specified in the respective Wrap Fee Program Brochure. Depending on the selected program, these minimums range from \$150,000 to \$500,000.

Chandler also enters into selected sub-advisory arrangements or participates as a manager in selected dual contract sponsored programs. In such instances, Chandler typically provides advisory services to a client under a sub-advisory arrangement with an unaffiliated registered investment adviser ("RIA"), or under an investment management agreement with an advisory client who also has an advisory agreement with an unaffiliated RIA or financial consultant intermediary. Chandler may or may not have a service agreement with the sponsor of a dual-contract program. With the exception of certain pre-existing fixed income portfolio management clients, typically Chandler is granted full investment discretion (subject to limitations on the firm's discretion to select broker-dealers for portfolio transactions, as discussed below) and manages a client's portfolio based on the individual needs of that client, as communicated through the sponsor, the RIA or other designated intermediary. The relevant information is submitted to Chandler and a determination is made as to whether participation in this program is appropriate for the client. On an ongoing basis, the participating client's financial consultant is responsible for obtaining and communicating to us any changes in the client's financial circumstances and/or objectives, including modifications to any client-imposed restrictions, if applicable.

Currently Chandler provides investment management services as an investment manager in the following dual-contract or sub-advisory sponsored programs:

- Charles Schwab Corporation ("Schwab") Market Place
- Fidelity Investments ("Fidelity") Separate Account Network
- TD Ameritrade Institutional ("TDAI") Separate Account Exchange
- Merrill Lynch ("ML") Managed Account Services
- FDx Advisors Inc. ("FDxA") Folio Dynamix Advisory Services Program ("Folio Dynamix Program")
- Wells Fargo Advisors ("WFA") Private Advisor Network ("PAN")

#### **ITEM 4E: ASSETS UNDER MANAGEMENT**

##### **Assets Under Management As of December 31, 2019**

	Discretionary	Non-Discretionary	Total
Assets Managed	\$16,367,505,580	\$3,184,641,867	\$19,552,147,447

#### **ITEM 5 FEES AND COMPENSATION**

##### **ITEM 5A: FEE SCHEDULES**

The annual fee for non-wrap fee client accounts is charged as a percentage of assets under management, according to the following schedules:



Fixed Income Portfolio Management for Institutional Accounts	
Assets Under Management	Annual Asset Management Fee
All Assets	0.15 of 1% (15 basis points)

A minimum of \$20 million in assets under management is required for this service. Chandler reserves the right to negotiate alternative minimum account size and fees on a case-by-case basis. Chandler will aggregate certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Guided Portfolio Strategies “GPS” Portfolio Management for Institutional Accounts	
Assets Under Management	Annual Asset Management Fee
All Assets	0.35 of 1% (35 basis points)

A minimum of \$2 million in assets under management is required for this service. Chandler reserves the right to negotiate alternative minimum account size and advisory fees on a case-by-case basis. Chandler will aggregate certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

Multi Asset Class Portfolio Management for All Accounts	
Assets Under Management	Annual Asset Management Fee
All Assets	0.25 of 1% (25 basis points)

A minimum of \$1 million in assets under management is required for this service. Chandler reserves the right to negotiate alternative minimum account size and advisory fees on a case-by-case basis. Chandler will aggregate certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

#### **FIXED INCOME PORTFOLIO MANAGEMENT FOR NON-INSTITUTIONAL ACCOUNTS; DUAL CONTRACT SPONSORED PROGRAMS OR SUB-ADVISORY ARRANGEMENTS**

Chandler’s fees will vary with a maximum of 0.35 of 1% depending upon the program and strategy in which the client is participating. Chandler’s fees for non-institutional clients are typically paid monthly, in arrears, but can vary based on the terms of the governing agreements. Chandler’s fees earned pursuant to dual contract programs or sub-advisory arrangements will be paid in accordance with the terms of each such program.

For non-institutional accounts (e.g., high net worth), a minimum of \$1 million in assets under management is required for this service. For dual contract and sub-advisory relationships, account minimums range from \$150,000 to \$500,000 depending on the program and the composition of the assets being managed. Account size may be negotiable under certain circumstances. Chandler groups certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee.

#### **FIXED INCOME PORTFOLIO MANAGEMENT FOR WRAP FEE PROGRAMS**

Chandler will be compensated through a portion of the total wrap fee charged by the program sponsor (with Chandler’s fees ranging up to a maximum of 0.35 of 1%. The all-inclusive wrap fee collected by a wrap sponsor includes Chandler’s advisory fee. Chandler does not control the fees or the billing arrangements in any Wrap Program.

Chandler is paid its fees for Schwab's Managed Accounts Select Program monthly, in arrears, while our fees for Envestnet's SMA and UMA Programs are paid quarterly, in arrears. Fees paid for ML's Managed Account Services Program are paid quarterly in advance. The wrap or UMA sponsor pays Chandler its advisory fee on behalf of the Wrap or UMA Client. For a complete description of the fee arrangement, including billing practices, minimum account requirements and account termination provisions, clients should review the respective sponsors' Wrap Fee Program Brochure. Clients participating in these programs should also review important disclosures about Chandler's brokerage practices described in Item 12 below.

### **CONSULTING SERVICES FEES**

Chandler's Consulting Services fees will be determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Chandler's Consulting Services fees are calculated in one or both of two ways:

1. On a fixed fee basis, subject to the specific arrangement reached with the client; and/or
2. On an hourly basis, ranging up to \$500.00 per hour. An estimate for the total hours is determined at the start of the advisory relationship.

The length of time it will take to complete Consulting Services will depend on the scope and terms of the engagement. Fees are due and payable upon completion of the Consulting Service or on an agreed upon payment schedule. A retainer may be requested upon completion of Chandler's fact-finding session with the client; however, advance payment will never exceed \$1,200 for work that will not be completed within six months. There is no minimum fee for Chandler's Consulting Services.

### **GENERAL FEE INFORMATION PERTAINING TO INSTITUTIONAL AND NON-INSTITUTIONAL ACCOUNTS, DUAL CONTRACT SPONSORED PROGRAMS AND SUB-ADVISORY ARRANGEMENTS**

***Grandfathering of Minimum Account Requirements:*** Pre-existing advisory clients are subject to Chandler's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements and advisory fees differ among clients.

***Advisory Fees in General:*** Clients should note that similar advisory services may or may not be available from other registered investment advisers for similar or lower fees. Chandler's clients are not required to pay any start-up or closing fees; there are no penalty fees.

***Termination of the Advisory Relationship:*** A client agreement between a client and Chandler may be canceled at any time, by either party, for any reason upon receipt of written notice. As disclosed in Item 5D below, certain fees may be paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be promptly refunded to the client. In calculating a client's reimbursement of fees, we will pro rate to the effective date of termination on the basis of actual days elapsed.

***Fee Calculation:*** Chandler's annual advisory fee is billed monthly or in some instances quarterly, in arrears, and is calculated based on the average market value of a client's account for the billing period, including accrued interest unless indicated otherwise in the client agreement. Cash and cash equivalent balances are included in the total market value calculation unless noted otherwise in the client agreement. We will value securities or investments in the portfolio in a manner determined in good faith to reflect fair market value. Chandler uses an independent third-party pricing source to value client securities.

***Limited Negotiability of Advisory Fees:*** Although Chandler has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a case-by-case basis. Client facts, circumstances and needs will be considered in determining the fee schedule. These include the complexity of the client, the assets to be placed under management, the anticipated future additional assets; the existence of any related accounts; portfolio style, account composition, reports, among other factors. The specific annual fee schedule will be identified in the written agreement between Chandler and each client.

We group certain related client accounts for the purposes of achieving the minimum account size requirements and determining the annual advisory fee.

Chandler reserves the right to reduce or waive advisory fees for services provided to related persons of the firm and their immediate family members. Such rates are not available to all of Chandler's advisory clients.

#### **GENERAL FEE INFORMATION PERTAINING TO WRAP FEE CLIENT ACCOUNTS**

**Fee Calculation:** Chandler's annual advisory fees charged to wrap fee program clients are calculated and billed by the respective program sponsor. As Chandler does not control the billing arrangements in these programs, clients should review the applicable disclosure documents for a comprehensive understanding of the fees charged and the billing practices of the program.

**What services are covered by the Wrap Program fees?** Wrap Program fees typically pay for our firm's advisory services to participating clients, administrative expenses, custody charges for clients' assets custodied at the Wrap Program's designated custodian and brokerage services for participating client accounts to the extent trades are conducted through the Wrap Program's designated broker-dealer.

**What services are not covered by the Wrap Program fees?** Wrap Program fees do not cover brokerage to the extent trades are conducted through brokers or dealers other than the designated broker or dealer and custody charges if client assets are custodied anywhere other than the designated custodian. The program fees do not include expenses of mutual funds and electronically traded funds such as fund management fees charged to each fund's investors. Chandler's fixed income transactions are generally executed by the broker-dealer on a net basis, which means the execution costs (e.g., commissions) are included in the purchase or sale price of the security.

**WRAP FEE PROGRAMS FEES: CLIENTS PARTICIPATING IN WRAP FEE PROGRAMS WILL BE CHARGED VARIOUS PROGRAM FEES IN ADDITION TO THE ADVISORY FEE CHARGED BY OUR FIRM. CLIENTS SHOULD CAREFULLY EVALUATE SUCH AN ARRANGEMENT TO DETERMINE IF THE WRAP FEE PAID FOR THE SERVICES PROVIDED MAY OR MAY NOT EXCEED THE AGGREGATE COST OF SUCH SERVICES IF THEY WERE TO BE PROVIDED SEPARATELY.**

#### **ITEM 5B: FEE PAYMENT**

Generally, each non-wrap client's custodian debits Chandler's advisory fees from the client's account and pays such fee directly to us upon receipt of an invoice, unless otherwise arranged by the client. Clients entering into written agreements with Chandler have discretion over whether or not Chandler may directly debit fees from the client's account. Clients who do not permit direct debiting will be invoiced directly with payment due upon receipt of the invoice.

Sub-advisory and dual contract client agreements require the client to authorize the custodian to pay Chandler its advisory fees directly from the client's account, which will be paid in arrears in accordance with the terms of each such program.

Fees for Schwab's Managed Accounts Select Program are paid monthly, in arrears, while our fees for Envestnet's SMA and UMA's Programs are paid quarterly, in arrears. ML's Managed Account Services Program are paid quarterly in advance. All of these programs require a client to authorize the sponsor to deduct the fees directly from the client's account to pay Chandler. For a complete description of the fee arrangement including billing practices and account termination provisions for wrap fee programs, clients should review the respective sponsors' Wrap Fee Program Brochure.

#### **ITEM 5C: OTHER FEES AND EXPENSES AND VALUATION POLICY**

**Mutual Fund Fees:** All fees paid to Chandler for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETFs to their shareholders. The fees and expenses charged by mutual funds and ETFs are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, 12b-1 fees and possible distribution or redemption fees. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. A client could invest in a mutual fund directly, without our services. In that case, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives.

Importantly, clients should review both the fees charged by mutual funds and ETFs and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being

provided. Chandler is not affiliated with any mutual funds or ETFs, does not share in the fees charged by mutual funds and ETFs, does not participate in the investment decisions regarding the portfolios of mutual funds and ETFs and is not liable with regard to such investments.

The fees and related expenses charged by mutual funds and ETFs can be found in the respective fund's prospectus and statement of additional information, which should be read carefully before investing.

**Short Term Idle Cash Investment:** Chandler can move some or all of the non-invested cash in a client's account to a money market mutual fund that may generate an interest return. If the cash is invested through a mutual fund, there may be times when an affiliate of the client's custodian may be the manager of such fund and would receive separate management fees from the mutual fund. Chandler is not affiliated with any such custodian, does not share in that fee, does not participate in the investment decisions of the mutual fund portfolio and is not liable with regard to such investments.

**Custodian and Broker Fees and Expenses:** In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker-dealers, including, but not limited to, any transaction charges imposed by a broker-dealer that effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Brochure for additional information.

From time to time, Chandler recommends a custodian to clients who do not have an existing custodial relationship established. Among others, Chandler generally recommends Union Bank, Bank of New York/Mellon, US Bank, Wells Fargo, Bank of America or Charles Schwab & Co. Some of these custodians offer special pricing for institutional clients of Chandler. Chandler does not receive any compensation from the custodians we refer to our clients. The rates offered will depend on the size of the assets or type of account. Clients retain full discretionary authority over the selection of the custodian to be used.

**Valuation Policy:** For all publicly traded securities held in clients' accounts, Chandler receives daily prices electronically from a third-party provider, which are reviewed internally on a monthly basis by designated investment personnel. When it is believed that the price provided is not correct or for times when the third party does not provide a price, Chandler will obtain pricing from a different third-party pricing source. This creates a conflict of interest since this practice could incentivize the designated investment personnel to select a pricing source that reflects a higher price per share for the security. To address this conflict, Chandler maintains detailed written policies and procedures regarding valuation of clients' securities, which includes among other things, a list of approved third-party pricing vendors used by Chandler and reviews of price changes by the CIO and CCO.

#### **ITEM 5D: PREPAID FEES**

**Limited Prepayment of Fees:** Under no circumstances do we require or solicit payment of fees in excess of \$1,200 more than six months in advance of services rendered.

**Fees for ML's Manager Account Services Program** are billed quarterly in advance. For a complete description of the fee arrangement, including billing practices and account termination provisions, clients should review the respective sponsors' Wrap Fee Program Brochure or other applicable disclosure document(s).

#### **ITEM 5E: COMPENSATION FOR THE SALE OF SECURITIES OR INVESTMENT PRODUCTS**

Chandler is not affiliated with any broker-dealers or mutual fund companies, and therefore we do not receive any compensation for the purchase or sale of securities or investment products used in client accounts.

### **ITEM 6 PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Chandler does not charge performance-based fees (*i.e.*, fees calculated based on a share of capital gains on or capital appreciation of the client's assets or any portion of the client's assets).

Consequently, we do not engage in side-by-side management of accounts that are charged a performance-based fee with accounts that are charged another type of fee (such as assets under management).

## ITEM 7 TYPES OF CLIENTS

Chandler provides advisory services to the following types of clients:

- State, local or other municipal government entities
- Healthcare institutions
- Higher education institutions
- Charitable organizations
- Pension and profit-sharing plans (other than plan participants)
- Individuals (other than high net worth individuals) only through Wrap and Dual Contract programs
- High net worth individuals
- Corporations or other business entities not listed above
- Retirement Accounts

As disclosed above in Item 5A of this Brochure, we have established certain initial minimum account asset requirements to maintain an account, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

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

### ITEM 8A: METHODS OF ANALYSIS & INVESTMENT STRATEGIES

#### METHODS OF ANALYSIS

Chandler uses all or any combination of the following methods of analysis in formulating our investment advice and/or managing client assets:

- **Fundamental Analysis.** We attempt to measure the intrinsic value of a security or a market sector by looking at broad economic and financial factors (including the overall economy, industry conditions, and the market's valuation of the security or market sector) to identify securities or market sectors that we believe are fairly valued or undervalued.

Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the security.

- **Technical Analysis.** We analyze past market movements and may occasionally apply that analysis to choose the price at which we wish to purchase or sell a given security. While we may seek a specific price for a security, technical analysis is never the main determinant of our purchase or sell process.

A risk in using technical analysis is that the methods or models we use may not result in the best price of a given day.

- **Quantitative Analysis.** We use a proprietary quantitative model (Horizon Analysis Model) that utilizes mathematical analysis to estimate the impact of interest rate changes on individual securities and portfolios of securities. The results of our quantitative analysis are taken into consideration in the decision to buy or sell securities and in the management of portfolio characteristics.

A risk in using quantitative analysis is that the methods or models used may be based on assumptions that prove to be incorrect.

- **Qualitative Analysis.** We use qualitative analysis to evaluate individual securities, focusing on other non-quantifiable factors, such as quality of management, not readily subject to measurement, and incorporate that analysis into our security selection process.

A risk in using qualitative analysis is that our subjective judgment may prove incorrect.

- **Asset Allocation.** We generally focus on identifying an appropriate allocation of securities, maturities,

market sectors and yield curve positioning suitable for the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the allocation will change over time due to market movements in the various sectors, which, if not corrected, may no longer be appropriate for the client's goals.

- **Mutual Fund and/or ETF Analysis.** In selecting mutual funds and ETFs for Multi Asset Class portfolios, we look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF to determine if there is significant overlap in the underlying investments held in other fund(s) in the client's portfolio. We monitor the funds and ETFs to determine if they continue to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, potentially increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

#### ***Risks for all forms of analysis***

Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell as well as other purchased or publicly available sources of information about these securities are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

### **FIXED INCOME PORTFOLIO MANAGEMENT INVESTMENT STRATEGIES**

We believe that a conservative, risk-controlled approach to fixed income management will provide both steady incremental outperformance, and low relative volatility.

The disciplined process we employ in an effort to realize this philosophy is generally grounded in four key decisions:

- Constraint of portfolio duration within a narrow range relative to the benchmark in order to limit exposure to market risk
- Strategic allocations to key sectors to add value relative to the benchmark
- Active management of term structure to add value in different yield curve environments
- Security selection based on rigorous credit and relative value analysis and broad diversification of non-government issuers.

Within our fixed income strategy, we use the following sub-strategies in managing client accounts, provided that such sub-strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

- **Duration Constraints.** We adhere to a discipline of generally maintaining duration within a narrow band around benchmark duration in order to limit exposure to market risk. Our portfolio management team rebalances client portfolios to their current duration targets on a periodic basis.

The risk of constraining duration is that the client may underperform a neutral duration portfolio as bond prices move up or down.

- **Sector Allocation.** We allocate client assets to various sectors of the fixed income market, including US Treasury obligations, federal agency securities, corporate notes, mortgage-backed securities and others, based on our quantitative and qualitative analysis in order to manage client exposure to a given sector and to provide exposure to sectors we believe have good value.

The risk of sector allocation is that clients may underperform depending on the allocation to any particular sector as those prices rise or fall.

- **Security Selection.** A proprietary credit evaluation process drives our security selection process. The system uses both internally and externally generated credit research to evaluate securities we are considering for purchase. Based on research we conduct internally; our Credit Committee selects securities for our Approved list. The ultimate decision to purchase or sell a security is based on the firm's evaluation of the current price for the security.

The risk of security selection is that the methods of analysis employed will not provide accurate measurement of the risk association with each individual security.

- **Long-term purchases.** We purchase securities with the idea of holding them in the client's account for a year or longer. Typically, we employ this sub-strategy when:
  - we believe the securities to be well valued, and/or
  - we want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantage of short-term gains that could be profitable to a client. Moreover, if our analysis is incorrect, a security may decline sharply in value before we make the decision to sell.

## **MULTI ASSET CLASS PORTFOLIO MANAGEMENT INVESTMENT STRATEGIES**

We invest in Multi Asset Class portfolios for clients with certain objectives and risk tolerances. This strategy begins with assumptions that the firm develops about the expected long-term performance of various asset classes including domestic and foreign stocks and bonds, real estate, commodities, cash and others. Based on the expected returns and risk characteristics of these asset classes, we prepare an asset allocation suitable for the individual client's objectives and risk tolerances. The investment vehicles that we currently employ for this strategy are mutual funds or exchange-traded funds (ETFs) that are designed to track market returns and volatilities.

The mutual funds or ETFs will be selected on the basis of any or all of the following criteria: the fund's performance history; the industry sector in which the fund invests; the track record of the fund's manager; the fund's investment objectives; the fund's management style and philosophy; and the fund's management fee structure. Portfolio weighting between funds and market sectors will be determined by each client's individual needs and circumstances.

Once the client's portfolio is in place, we rebalance it each quarter to the client's target allocation. On an annual basis, at a minimum, we review the costs and performance of our selected investment vehicles to ensure the funds or ETFs are performing as we expect.

The risks of this strategy include (1) that our analysis of long-term return expectations will not be correct; (2) that the portfolios will not be properly rebalanced; (3) that the investment vehicles we employ will not track market returns and volatility as we expect. Detailed information on the risks associated with the investments made by the mutual funds or ETFs, will be outlined in each fund's prospectus.

### **ITEM 8B: MATERIAL RISKS**

**Risk of Loss.** Securities investments are not guaranteed and a client may lose money on their investments. We ask that each client work with us to help us understand their tolerance for risk. Investors should be aware that investment prices fluctuate as the securities are affected by economic and other factors. As a result, the value of your investment may increase or decrease. Bonds held to maturity will return the full par or face value amount to the bondholder at maturity (absent a default); however, those sold prior to maturity are subject to gain or loss depending on the market price at the time of sale.

For risks specific to a particular method of analysis or investment strategy, please see Item 8A above.

For risks specific to a particular type of security, please see Item 8C below.



## **ITEM 8C: RISKS ASSOCIATED WITH PARTICULAR TYPES OF SECURITIES USED**

### **RISKS ASSOCIATED WITH FIXED INCOME SECURITIES**

Chandler specializes in investment grade fixed income portfolio management. Despite the generally conservative nature of many fixed income investments, there are a variety of risks associated with fixed income investing.

Fixed income securities represent monies lent by investors to corporate and government institutions. Risks vary according to the type of fixed income investment purchased along with the general level of interest rates in the economy.

The risks commonly associated with fixed income securities are:

- **Market Risk:** The price of the security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
- **Interest Rate Risk:** The risk that the value of an interest-bearing investment will change due to changes in the general level of interest rates in the market. The market value of a bond fluctuates inversely to the change in interest rates; that is, as interest rates rise, bond prices fall and vice versa.

Interest rate risk is commonly measured by a bond's duration; the greater a bond's duration, the greater the impact on price of a change in interest rates. Investors may incur a gain or loss from bonds sold prior to the final maturity date.

- **Credit Risk:** The risk that principal and/or interest on a fixed income investment will not be paid in a timely manner or in full due to changes in the financial condition of the issuer. Generally, the higher the perceived credit risk, the higher the rate of interest investors will receive on their investment.

Many bonds are rated by a third party Nationally Recognized Statistical Rating Organization (NRSRO), for example, Moody's Investor Services or Standard & Poor's Inc. While ratings may assist investors to determine the creditworthiness of the issuer, they are not a guarantee of performance.

- **Reinvestment Risk:** The risk that interest and principal payments from a bond will be reinvested at a lower yield than that received on the original bond. During periods of declining interest rates, bond payments may be invested at lower rates; during periods of rising rates, bond payments may be invested at higher rates.
- **Call Risk:** The risk that a bond will be called by its issuer. A callable bond has a provision which allows the issuer to purchase the bond back from the bondholders at a predetermined price. Generally, issuers call bonds when prevailing rates are lower than the cost of the outstanding bond. Call provisions allow an issuer to retire high-rate bonds on a predefined call schedule.
- **Prepayment Risk:** Some types of bonds are subject to prepayment risk. Similar to call risk, prepayment risk is the risk that the issuer of a security will repay principal prior to the bond's maturity date, thereby changing the expected payment schedule of the bonds.

Prepayment risk is particularly prevalent in the mortgage-backed bond market, where a decline in interest rates can trigger loan holders to pre-pay their mortgages. When investors in a bond comprised of the underlying pool of mortgages receives his or her principal back sooner than expected, they may be forced to reinvest at prevailing, lower rates.

- **Liquidity Risk:** The risk stemming from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss. Liquidity risk is typically reflected in a wide bid-ask spread or large price movements.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Opportunity Cost Risk:** The risk that an investor may forego profits or returns from other investments.

## RISKS ASSOCIATED WITH MUTUAL FUNDS AND ETFS

As discussed in further detail in Item 4B above, Chandler also offers a Multi Asset Class strategy to clients seeking to attain balanced returns. This strategy provides exposure to various equity, fixed income and other asset classes through investments in indexed or actively managed mutual funds and exchange traded funds ("ETFs").

Chandler is not affiliated with any such mutual fund or ETF company, does not share in any fees charged by a mutual fund or ETF and does not participate in any investment decisions relating to the management of a mutual fund or ETF portfolio.

### Mutual Funds

A mutual fund is a company that pools money from many investors and invests the money in different securities or assets based on the investment strategy or goals of the particular fund. Each share of a mutual fund represents an investor's proportionate ownership of the fund's holdings and the income those holdings generate.

The risks most commonly associated with mutual funds are:

- **Market Volatility:** Investment returns will fluctuate and are subject to market volatility, so that a client's shares, when redeemed or sold, may be worth more or less than their original cost. Past performance is no guarantee of future results.
- **Tracking Error for Index Funds:** Index mutual funds seek to track the returns of a market benchmark such as the S&P 500 index, by holding the same securities or a representative sample. A risk of using index mutual funds is that the fund may not be able to track its benchmark closely creating the potential for lower returns than the benchmark.
- **Lack of Control/Transparency:** Clients typically are not given the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.
- **Price Uncertainty:** With an individual stock, a client can obtain real-time pricing information with relative ease by either checking financial websites or by calling a broker. With a mutual fund, the price at which a client purchases or redeems shares will typically depend on the fund's NAV, which the fund might not calculate until many hours after a client has placed their order. Mutual funds generally calculate their NAV at least once per business day.
- **International Risk:** Chandler invests in Mutual Funds offered by US based fund companies that invest in non-US companies and markets, which entail additional risks. Non-US markets may be more volatile due to a variety of factors including, less liquidity, transparency and oversight of companies or assets. Values of non-US investments may fluctuate due to changes in currency exchange rates. Non-US companies are also subject to risks that come with political and economic stability that may affect their respective countries. These risks may be greater in emerging market countries.

### Exchange-Traded Funds (ETFs)

ETFs are investment funds that trade on stock exchanges much like stocks and will fluctuate in market value. ETFs also may trade at prices above or below the ETFs net asset value. Brokerage commissions and ETF expenses will reduce returns. Additionally, frequent trading of ETFs could significantly increase commissions and other costs such that they may offset any savings from low fees or costs.

Equity based ETFs are subject to risks similar to those of stocks and fixed income ETFs are subject to risks similar to those of bonds.

The risks most commonly associated with ETF securities are:

- **Market Volatility:** Investment returns will fluctuate and are subject to market volatility, so that a client's shares, when redeemed or sold, may be worth more or less than their original cost. Past performance is no guarantee of future results.
- **Tracking Error for Index ETFs:** Index ETFs seek to track the returns of a market benchmark such as S&P 500 index, by holding the same securities or a representative sample. A risk of using index ETFs is

that the fund may not be able to track its benchmark closely creating the potential for lower returns than the benchmark.

- **Lack of Control/Transparency:** Clients typically are not given the exact make-up of a fund's portfolio at any given time, nor can they directly influence which securities the fund manager buys and sells or the timing of those trades.
- **Liquidity Risk:** The risk stemming from the lack of marketability of an investment that cannot be bought or sold quickly enough to prevent or minimize a loss. Liquidity risk is typically reflected in a wide bid-ask spread or large price movements.
- **International Risk:** Chandler invests in ETFs offered by US based fund companies that invest in non-US companies and markets, which entail additional risks. Non-US markets may be more volatile due to a variety of factors including, less liquidity, transparency and oversight of companies and assets. Values of non-US investments may fluctuate due to changes in currency exchange rates. Non-US companies are also subject to risks that come with political and economic stability that may affect their respective countries. These risks may be greater in emerging market countries.

Chandler does not represent, guarantee or imply that the services or methods of analysis employed by us can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

## **ITEM 9      DISCIPLINARY INFORMATION**

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management. Neither our firm nor our Management Persons have any reportable disciplinary events to disclose.

## **ITEM 10      OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Our firm and our related persons are not engaged in other financial industry activities and have no other industry affiliations.

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

### **ITEM 11A: CODE OF ETHICS**

Our firm maintains a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Chandler and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement), an initial public offering and certain other securities. Our Code also provides for oversight, enforcement and recordkeeping provisions.

Chandler's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are periodically reminded that such information may not be used in a personal or professional capacity.

Our Code of Ethics is distributed to all supervised persons of Chandler whenever revisions are made or no less

frequently than annually, at which time all employees are required to provide a written acknowledgement and attestation of their intent to abide by Chandler's Code provisions.

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to [Compliance@chandlerasset.com](mailto:Compliance@chandlerasset.com), or by calling us at 858-546-3737.

#### **ITEM 11B: PRINCIPAL TRADING AND AGENCY CROSS TRADING**

Chandler and individuals associated with our firm are prohibited from engaging in principal transactions.  
Chandler and individuals associated with our firm are prohibited from engaging in agency cross transactions.

#### **ITEM 11C: PERSONAL TRADING**

Chandler and/or individuals associated with our firm can from time to time, buy or sell for their personal accounts, securities identical to or different from those recommended to our clients. In addition, any related person(s) could potentially have an interest or position in a security(ies) which may also be recommended to a client.

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients, and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. It is also designed to help prevent employees from benefiting from transactions placed on behalf of advisory clients.

For additional information on how we address the conflicts of interest that arise in connection with personal trading, please see Item 11D below.

#### **ITEM 11D: PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

From time to time, Chandler will aggregate trades for our self or our employees with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular aggregated order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be excluded in such a pro-rata allocation.

Because the situations outlined above represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

1. No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
2. No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
3. No principal or employee may benefit from transactions placed on behalf of advisory accounts.
4. Our firm requires prior approval for any IPO, private placement investments and certain other securities by related persons of the firm.
5. We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or designee.
6. We have established procedures for the maintenance of all required books and records.
7. Clients may decline to implement any advice rendered, except in situations where our firm is granted discretionary authority.
8. All of our principals and employees must act in accordance with all applicable Federal and State

regulations governing registered investment advisory practices.

9. We require delivery and acknowledgement of the Code of Ethics by each supervised person (as defined by the Code) of our firm.
10. We have established policies requiring the reporting of Code of Ethics violations to our senior management.
11. Any individual who violates any of the above restrictions may be subject to sanctions, which may include termination of employment.

## **ITEM 12      BROKERAGE PRACTICES**

### **ITEM 12A: BROKER-DEALER SELECTION, COMPENSATION & TRADE AGGREGATION**

#### **FIXED INCOME & MULTI ASSET CLASS PORTFOLIO MANAGEMENT**

Chandler requires discretionary clients to provide us with written authority to determine broker-dealer selection and commission costs that will be charged to these clients for transactions placed in their account(s).

Broker-dealers are selected by Chandler on the basis of best execution, a combination of most favorable price and the quality of execution. In selecting a broker to execute a transaction for a client, Chandler considers a variety of other factors, including (but not limited to) the following:

- the broker-dealer's capital depth;
- the broker-dealer's market access;
- the nature of the security or instrument being traded;
- the size and type of transaction;
- the nature and character of the markets for the security or instrument to be purchased or sold;
- the desired timing of the transaction;
- the execution, clearance and settlement capabilities of the broker-dealer selected, and others considered;
- the reputation and perceived soundness of the broker-dealer and others considered;
- Chandler's knowledge of any actual or apparent operational problems with the broker-dealer; and
- the reasonableness of the commission for specific transactions.

While Chandler generally seeks competitive commission rates and dealer spreads, it may not necessarily pay the lowest commission. Transactions may involve specialized services on the part of the broker-dealer and thereby justify higher commissions than would be the case with other transactions requiring more routine services.

In regard to commission rates paid, Chandler's fixed income transactions are generally executed by the broker-dealer on a net basis, which means the execution costs (*e.g.*, commissions) are included in the purchase or sale price of the security. Equity and ETF transactions will be charged commissions.

#### **FIXED INCOME PORTFOLIO MANAGEMENT IN WRAP FEE OR SUB-ADVISORY PROGRAMS**

##### **Managed Accounts Select Program**

Chandler participates in the Schwab Institutional ("SI") services program offered to independent investment advisers by Charles Schwab & Company, Inc. (Schwab), a FINRA registered broker-dealer unaffiliated with Chandler. Wrap fee clients participating in this program are required to utilize Schwab as the custodian for their assets managed within the program. As part of the SI program, Chandler receives benefits that it would not receive if it did not offer investment advice (See the disclosure under Item 12A.1 of this Brochure).

Chandler arranges for all securities transactions in wrap program accounts to be executed through the sponsoring party, subject to best execution considerations described above. If Chandler determines that best execution considerations require trading with brokers other than the sponsoring party, clients can incur additional

trading costs. These costs are a factor in Chandler's best execution analysis.

Chandler has established a prime brokerage account relationship with Schwab through which it can purchase fixed income products directly from third parties for clients and maintain custody at Schwab. In this situation, Chandler will select those brokers or dealers which will provide the best services at the lowest commission rates possible. The reasonableness of brokerage costs, commissions and mark-up/mark-downs is based on the broker-dealer's ability to provide professional services, competitive execution, and other services that will help Chandler in providing investment management services to clients. Thus, for fixed income transactions, Chandler may request that it be provided with written authority to determine the broker-dealer to use for client fixed income transactions and the costs that will be incurred by clients for these transactions. Any limitations on this discretionary authority shall be included in this written authority statement. Clients may change/amend these limitations as required. Such amendments shall be submitted in writing.

There are times when client trades in fixed income securities are aggregated with transactions for other advisory clients to achieve better pricing and commission costs. Fixed income trades will be allocated on a pro-rata basis in the best interest of the client as set forth in Chandler's policy and procedures manual.

#### **Envestnet Separately Managed and Unified Managed Accounts Programs**

Chandler participates as a separate account manager in Envestnet's Separately Managed Accounts (SMA) and Unified Managed Accounts (UMA) Programs offered to independent investment advisers by Envestnet Asset Management, Inc., an SEC registered investment adviser unaffiliated with Chandler. SMA and UMA Program clients are required to utilize Charles Schwab & Company, JP Morgan, Pershing Advisor Solutions, or Fidelity as the custodian for their assets managed within the program.

Chandler arranges for all securities transactions in SMA and UMA program accounts through the sponsoring party subject to best execution considerations described above. If Chandler determines that best execution considerations require trading with brokers other than the sponsoring party or client custodian, clients could incur additional trading costs. These costs are a factor in Chandler's best execution analysis.

#### **Folio Dynamix Advisory Services Program**

Chandler participates as a separate account manager in the Folio Dynamix Advisory Services Program ("Folio Dynamix Program") offered to independent advisers by FDx Advisors Inc. ("FDxA"), an SEC registered investment adviser unaffiliated with Chandler. Clients participating in this program typically will be required to custody their assets managed within the program with a designated custodian.

For example, clients participating in the Folio Dynamix Program through Cetera Investment Management LLC and/or certain other affiliated investment adviser entities under common control (individually referred to as a Cetera Adviser and collectively as Cetera Advisers) are required to custody their program assets with Cetera Investment Services LLC as clearing broker or with a third party clearing broker mutually acceptable to Cetera Adviser, FDxA and Chandler.

Generally, Chandler arranges for all securities transactions in Folio Dynamix Program accounts through the sponsoring party subject to best execution considerations described above. If Chandler determines that best execution considerations require trading with brokers other than the sponsoring party or client custodian, clients could incur additional trading costs. These costs are a factor in Chandler's best execution analysis.

#### **ITEM 12A.1: RESEARCH AND OTHER SOFT DOLLAR BENEFITS**

Chandler's soft dollar policy prohibits us from entering into third party soft dollar arrangements.

We are providing these additional disclosures as we believe clients should understand related issues surrounding soft dollars. The term Soft dollars generally refers to arrangements whereby a discretionary investment adviser is allowed to pay for and receive research, research-related or execution services from a broker-dealer or third-party provider, in addition to the execution of transactions, in exchange for the brokerage commissions from transactions for client accounts.

As disclosed in Item 4D of this Brochure, clients participating in the Schwab Managed Account Select wrap fee program are required to utilize Schwab as the custodian of their assets being managed within that program. Schwab Institutional provides Chandler with access to its institutional trading and operations services, which are typically not available to Schwab retail investors. These services generally are available to independent investment advisors at no charge to them so long as a specified minimum, generally \$10 million, of the advisor's

clients' account assets are maintained at Schwab Institutional.

These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab Institutional also makes available to our firm other products and services that create a benefit to Chandler but not a direct benefit to our clients' accounts. Many of these products and services are used to service all or some substantial number of our client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist us in managing and administering our clients' accounts include software and other technology that:

- provide access to client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from clients' accounts; and
- assist with back-office functions, recordkeeping and client reporting.

Schwab Institutional also offers other services intended to help us manage and further develop our business enterprise. These services include:

- compliance, legal and business consulting;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Although Chandler does not utilize such services, Schwab can also make available, arrange and/or pay third-party vendors for the types of services rendered to Chandler. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm.

Schwab Institutional may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend clients custody their assets at Schwab, we take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a potential conflict of interest. However, Chandler has a fiduciary responsibility to always place client interests before our own and we will only recommend Schwab to clients where we believe it would be beneficial to those clients.

Additionally, when placing trades with brokers, there are times when Chandler places certain trades with a third-party approved broker that is providing brokerage and research services to us ("Approved Broker"). Brokerage and research services provided by Approved Brokers can include, among other things, effecting securities transactions and performing services incidental thereto (such as clearance, settlement and custody) and providing proprietary research (i.e., created by the Research Broker). The research can pertain to the economy, industries, sectors of securities, individual companies, statistical information, political and/or developments, credit and risk measurement, and/or performance analysis. In selecting a broker for trade placement, Chandler can place transactions with Research Brokers that charge commissions, transaction costs or mark-ups that are in excess of that which another broker might have charged for effecting the same transaction, in recognition of the value of the brokerage and/or research services provided by the broker. This practice is commonly referred to as "soft dollars" and is permissible under Section 28(e) of the Securities Exchange Act of 1934, so long as certain conditions are met. In some cases, the research provided by Research Brokers is not utilized by Chandler and in other cases, it can be used in servicing any or all of our clients. In other words, there can be certain client accounts that benefit from the research services, which did not make the payment of commissions, transaction costs or mark-ups to the Approved Broker providing the services. This is allowed under Section 28(e); however, the receipt of brokerage and research services from any broker executing transactions for our clients will not result in a reduction of our customary and normal research activities. Also, the receipt of this type



of research can be deemed to be the receipt of an economic benefit by us, and although customary, creates a conflict of interest between Chandler and our clients. Therefore, we are providing these disclosures as we believe clients should understand the issues surrounding soft dollars. In addition, we only place trades where we feel best execution can be obtained, taking into consideration all factors surrounding the transaction and not just research received.

#### **ITEM 12A.2: BROKERAGE FOR CLIENT REFERRALS**

Chandler does not direct brokerage in exchange for client referrals.

#### **ITEM 12A.3: DIRECTED BROKERAGE**

Chandler's policy and practice is not to accept advisory clients' instructions for directing client's brokerage transactions, however from time to time, Chandler accepts written direction from a client regarding the use of a particular broker-dealer to execute some or all transactions for the client's account(s). In these circumstances, clients should understand that: (1) we do not negotiate specific brokerage commission rates with the broker on client's behalf, or may not seek better execution services or prices from other broker/dealers and, as a result, the client may pay higher commissions and/or receive less favorable net prices on transactions for their account than might otherwise be the case; (2) transactions for that account generally will be effected independently unless we decide to purchase or sell the same security for several clients at approximately the same time (block trade), in which case we may be able to include such client's transaction with that of other clients for execution if at the same broker; and (3) conflicts may arise between the client's interest in receiving best execution with respect to transactions effected for the account and Chandler's interest in receiving future client referrals from that broker. Therefore, prior to directing us to use a specific broker-dealer, clients should consider whether, under that restriction, execution, clearance and settlement capabilities, commission expenses and whatever amount is allocated to custodian fees, if applicable, would be comparable to those otherwise obtainable. Clients should understand that they might not obtain commissions rates as low as might otherwise be obtain if we had discretion to select other broker-dealers.

#### **ITEM 12B: AGGREGATING CLIENT TRADES**

Order aggregation is the process of adding together or "blocking" orders to purchase and sell the same security as one large order. Chandler will aggregate or "block" trades where possible and when advantageous to clients. This blocking of trades permits the trading of aggregate blocks of securities composed of assets from multiple client accounts and in some cases, employees and other proprietary accounts so long as transaction costs are shared equally and on a pro-rata (or other fair and reasonable) basis between all accounts included in any such block.

Block trading may allow us to execute trades in a timelier, more equitable manner, at a better overall price.

Chandler will aggregate trades for itself or for its associated persons with client trades, providing that the following conditions are met:

- 1) Chandler's policies for the aggregation of transactions shall be fully disclosed in this Form ADV Part 2A and separately to Chandler's existing clients (if any) and the broker-dealer(s) through which such transactions will be placed;
- 2) We will not aggregate transactions unless aggregation is consistent with our duty to seek best execution and the terms of Chandler's investment advisory agreement with each client for which trades are being aggregated;
- 3) No participating account will be favored over any other account; each account that participates in an aggregated order will participate at the average price for all the aggregated order, with transaction costs shared pro-rata, when applicable, on each account's participation in the transaction;
- 4) Chandler will enter aggregated orders into our Order Management System ("OMS"), specifying the participating accounts and how we intend to allocate the order among those accounts;
- 5) If the aggregated order is filled in its entirety, it will be allocated among participating accounts in accordance with the allocations entered into the OMS; if the order is partially filled, it will be allocated pro-rata based on the allocations entered into the OMS;



- 6) If the security is purchased from multiple dealers at different prices and is to be allocated among multiple accounts, it will be allocated using a weighted average method;
- 7) Allocations for an aggregated order should constitute no less than 0.50 of 1% (50 basis points) of a selected portfolio. If a proposed allocation would amount to less than 0.50 of 1% (50 basis points) of the selected portfolio, it may be allocated to a more appropriate account different from that specified in the OMS as long as all client accounts receive fair and equitable treatment and the reason for the different allocation is explained in a manner consistent with the procedures listed in number 8 herein;
- 8) Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the OMS if all client accounts receive fair and equitable treatment and the reason for the different allocation is explained in writing and is approved in writing by appropriate supervisory personnel no later than one hour after the opening of the markets on the trading day following the day the order was executed;
- 9) Chandler will receive no additional compensation of any kind as a result of the proposed aggregation;
- 10) Individual investment advice and treatment will be accorded to each advisory client.
- 11) Chandler's books and records will separately reflect, for each client account, the orders of which are aggregated, the securities held by, and bought and sold for that account.
- 12) Funds and securities for aggregated orders are clearly identified on Chandler's records and to the broker-dealers or other intermediaries handling the transactions, by the appropriate account numbers for each participating client.

There are times when Chandler does not aggregate trades when we have an opportunity to do so. Portfolio managers choose not to aggregate trades in the following situations:

- **Non-discretionary clients:** An advisory client electing not to grant investment discretionary authority to Chandler is advised that trades done in his/her account may be executed subsequent to trades effected in discretionary accounts due to the additional time involved in obtaining the required client approval prior to executing any trade in such non-discretionary client accounts. Consequently, we may not be able to aggregate these trades with other discretionary trades which may result in a difference in the price per share/bond of a given security and the commission rates paid.
- **Client direction:** While rare, an advisory client may choose not to have their trades aggregated or may have cash flow needs that prevent Chandler from aggregating a trade with other pending orders. Consequently, we may not be able to aggregate these client trades with other client trades which may result in a difference in the price per share/bond of a given security and the commission rates paid.
- **Portfolio Manager's discretion:** Portfolio managers may choose to trade certain strategies at the same time while waiting to trade others. The timing of the trades and determination of which strategy to trade is dependent on market conditions.

Additionally, not all portfolio managers will trade their client accounts at the same time and there may be timing differences for trades executed by different portfolio managers. Accordingly, we may not be able to aggregate all trades executed independently by our different portfolio managers, which may result in a difference in the price per share/bond of a given security and the commission rates paid.

## **ITEM 13      ACCOUNT REVIEWS**

### **ITEM 13A: PERIODIC ACCOUNT REVIEWS**

#### **FIXED INCOME & MULTI ASSET CLASS PORTFOLIO MANAGEMENT**

The underlying securities within client accounts are continually monitored and reviewed daily in our Order Management and Portfolio Compliance System (OMS) in the context of each client's stated investment objectives and guidelines. Additional reviews may be triggered by material changes in variables such as the client's individual circumstances, liquidity requirements, credit analysis or the market, political or economic

environment.

These accounts are reviewed by our Chief Investment Officer, Portfolio Managers and our compliance department.

#### **WRAP FEE PROGRAMS**

Program clients should refer to the selected Sponsor's Wrap Fee Program Brochure and, if applicable, the independent advisor's disclosure document for information regarding reviews performed by the sponsor or independent advisor and the frequency of reviews conducted on the client's Program account(s).

#### **CONSULTING SERVICES**

While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Consulting Services clients unless otherwise contracted for. Such reviews will be conducted by the client's account representative.

#### **ITEM 13B: OTHER REVIEWS**

Chandler reviews accounts on a periodic basis as described above in Item 13A of this brochure.

#### **ITEM 13C: REPORTING**

#### **FIXED INCOME & MULTI ASSET CLASS PORTFOLIO MANAGEMENT**

In addition to the monthly account statements that non-wrap clients receive from their custodian and confirmations of transactions that they receive from the executing broker-dealer, we provide written monthly reports summarizing account performance, balances and holdings, transactions, income earned and cash flow expected for the next 365 days.

#### **WRAP FEE PROGRAMS**

Program clients should refer to the selected Sponsor's Wrap Fee Program Brochure and, if applicable, the independent advisor's disclosure document for information regarding the content and frequency of reports provided by the sponsor or independent advisor to the client, if any. Chandler does not send any reports or account statements to wrap fee program clients.

#### **CONSULTING SERVICES**

These client accounts will receive written reports as contracted for at the inception of the advisory engagement.

### **ITEM 14 CLIENT REFERRALS AND OTHER COMPENSATION**

#### **ITEM 14A: OTHER COMPENSATION**

As outlined in Item 12A of this Brochure, certain indirect economic benefits are received by Chandler for clients that custody their assets with Schwab. While Chandler and its employees always endeavor to put the interest of our clients first, clients participating in the Schwab wrap programs should be aware that receipt of this indirect additional compensation creates a potential conflict of interest. However, Chandler has a fiduciary responsibility to always place client interests before our own and will only recommend Schwab to clients where we believe it would be beneficial to those clients.

#### **ITEM 14B: CLIENT REFERRALS**

Chandler's policy and practice is not to enter into arrangements to pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Compensation paid to certain related persons of Chandler takes

into consideration an overall assessment of predetermined objectives in addition to other defined criteria. Notably, this firm practice does not impact the advisory fees paid to Chandler by any client.

## **ITEM 15 CUSTODY**

Chandler does not take custody or possession of the funds or securities that a client has placed under our management. Each client shall appoint a Qualified Custodian ("custodian") to take and have possession of their assets. The fees expressed in the "Fees and Compensation" section (Item 5A) of this Brochure do not include fees a client will incur for custodial services.

From time to time, Chandler recommends a custodian to clients who do not have an existing custodian relationship established. Among others, Chandler generally recommends (in alphabetical order) Bank of America, Bank of New York/Mellon, Charles Schwab & Co., Union Bank, US Bank or Wells Fargo. Some of the above-mentioned custodians offer special pricing for institutional or municipal clients of Chandler. Chandler does not receive any compensation or referrals from the custodians we refer our clients to. The rates offered by the custodian can be based on the size of the portfolio or type of account opened. Client retains full discretionary authority over the selection of the custodian to be used.

### **Direct Debiting of Fees**

Although Chandler does not take custody or possession of the funds or securities that a client has placed under its management, Chandler is deemed by the SEC to have custody of those accounts where fees are debited directly from the client's custodian bank account. We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions and holdings within the account during the reporting period, in addition to any advisory fees paid.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

In addition to the periodic statements that clients receive directly from their custodians, we also send account statements directly to our clients on a monthly basis. While Chandler makes every effort to provide accurate statements, we urge our clients to carefully compare the information provided on our statements to statements provided by their custodian in order to ensure that all account transactions, holdings and values are correct and current.

## **ITEM 16 INVESTMENT DISCRETION**

Generally, clients hire us to provide discretionary asset management services; however, we do provide our services on a non-discretionary basis, if requested by a client.

Our discretionary authority includes the ability to do the following without first obtaining approval from the client:

- Determine the security to buy or sell;
- Determine the amount of the security to buy or sell; and
- Determine the price at which to buy or sell the security;

Clients give us discretionary authority when they sign a discretionary client agreement with our firm and may limit this authority by giving us written instructions. Such limitations are typically outlined in a client's investment policy statement and may include restrictions on maturity or ratings, issuer or sector concentration limitations, among others. Clients may also change/amend such limitations by once again providing us with written instructions. Chandler reserves the right to decline acceptance of any client account.

## **ITEM 17 VOTING CLIENT SECURITIES**

## **ITEM 17A: PROXY VOTING**

We vote proxies for the securities held in client accounts where the client has given us authorization to do so. All clients retain the right to vote their own proxies should they choose to do so. Clients can exercise this right by instructing us in writing to not vote proxies in their account and instructing their custodian to send proxies directly to their attention.

We will vote proxies in the best interests of our clients and in accordance with our established policies and procedures. Our firm will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict and retain an independent third-party to cast a vote.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting Nicole Dragoo, our Chief Compliance Officer, by telephone, email, or in writing. Clients may request, in writing, information on how proxies for their shares were voted. If any client requests a copy of our complete proxy policies and procedures or how we voted proxies for their account(s), we will promptly provide such information to the client.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies. To direct us to vote a proxy in a particular manner, clients should contact Nicole Dragoo by telephone, email, or in writing.

You can instruct us to vote proxies according to particular criteria (for example, to always vote with management, or to vote for or against a proposal to allow a so-called "poison pill" defense against a possible takeover). You can also instruct us on how to cast your vote in a particular proxy contest by contacting Nicole Dragoo by mail at 6225 Lusk Boulevard, San Diego, CA 92121 or by email at [Compliance@chandlerasset.com](mailto:Compliance@chandlerasset.com). These requests must be made in writing.

## **ITEM 17B: WHERE CLIENT RETAINS RIGHT TO VOTE PROXIES**

For accounts where we do not vote proxies, Chandler may provide investment advisory services relative to client investment assets. Clients maintain exclusive responsibility for:

- 1) Directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and
- 2) Making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets; and
- 3) Instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

## **ITEM 18 FINANCIAL INFORMATION**

### **ITEM 18A: FINANCIAL STATEMENT REQUIREMENT**

Under no circumstances do we require or solicit payment of fees in excess of \$1200 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement.

**ITEM 18B: FINANCIAL CONDITION**

Chandler has no financial conditions to disclose that would impair its ability to meet contractual and fiduciary obligations to clients.

**ITEM 18C: BANKRUPTCY DISCLOSURE**

Chandler has never been the subject of a bankruptcy petition.

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Kay Chandler, CFA

##### Chairman of the Board

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about Kay Chandler that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

Additional information about Kay Chandler is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Mary Catherine (Kay) Chandler
<b>Year of Birth:</b>	1948
<b>Post High School Education:</b>	Oberlin College; BA, Psychology; 1970
<b>Business Background:</b>	2018 to Present: Chairman of the Board & Principal – Chandler Asset Management, Inc. 2008 to 2018: President & Principal – Chandler Asset Management, Inc. 1988 to 2008: President, CEO & Principal – Chandler Asset Management, Inc.
<b>Professional Designations:</b>	Chartered Financial Analyst (CFA); CFA Institute; 1998 <i>For an explanation of the CFA designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Kay Chandler. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- Kay Chandler sits on the Investment Committee and serves as the Vice Chair and Secretary on the Board of Governors for the San Diego Foundation. Ms. Chandler devotes approximately 3 hours a month to this activity.
- Kay Chandler does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- Kay Chandler is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time.

### ITEM 5: ADDITIONAL COMPENSATION

Kay Chandler does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Board of Directors
<b>Title:</b>	
<b>Phone Number:</b>	(858) 546-3737

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Martin Cassell, CFA

#### CEO & Chief Investment Officer

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about Martin Cassell that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

Additional information about Martin Cassell is available on the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Martin Dayle Cassell
<b>Year of Birth:</b>	1959
<b>Post High School Education:</b>	California State University Hayward; BS, Finance; 1987
<b>Business Background:</b>	2008 to Present: CEO, Chief Investment Officer & Principal – Chandler Asset Management, Inc. 2003 to 2008: Chief Investment Officer & Principal – Chandler Asset Management, Inc. 1993 to 2003: VP, Portfolio Manager & Principal – Chandler Asset Management, Inc. 1991 to 1993: Portfolio Manager – Chandler Asset Management, Inc.
<b>Professional Designations:</b>	Chartered Financial Analyst (CFA); CFA Institute; 1998 <i>For an explanation of the CFA designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Martin Cassell. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- Martin Cassell sits on the Investment Committee for the San Diego Foundation and is on the Board of Trustees and Finance Committee for the San Diego Botanic Garden. Mr. Cassell devotes approximately 2-5 hours a month to these activities.
- Martin Cassell does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- Martin Cassell is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

Martin Cassell does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Board of Directors
<b>Title:</b>	
<b>Phone Number:</b>	(858) 546-3737



## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Ted Piorkowski, CFA

##### Senior Portfolio Manager

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about Ted Piorkowski that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Ted Piorkowski is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Theodore James Piorkowski
<b>Year of Birth:</b>	1959
<b>Post High School Education:</b>	California State University San Diego; BS, Finance; 1982 California State University San Diego; MBA, Finance; 1985
<b>Business Background:</b>	2009 – Present: Senior Portfolio Manager & Principal – Chandler Asset Management, Inc. 2004 to 2009: SVP, Portfolio Manager – Chandler Asset Management, Inc. 1999 to 2004: VP, Portfolio Manager – Chandler Asset Management, Inc. 1994 to 1999: VP, Fund Manager – Sefton Capital Management, Inc.
<b>Professional Designations:</b>	Chartered Financial Analyst (CFA); CFA Institute; 1991 <i>For an explanation of the CFA designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Ted Piorkowski. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- Ted Piorkowski is not engaged in any other investment-related activities.
- Ted Piorkowski does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- Ted Piorkowski is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

Ted Piorkowski does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Jayson Schmitt
<b>Title:</b>	Deputy Chief Investment Officer
<b>Phone Number:</b>	(858) 546-3737



## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Jayson Schmitt, CFA

##### Deputy Chief Investment Officer

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about Jayson Schmitt that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Jayson Schmitt is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Jayson Arnold Schmitt
<b>Year of Birth:</b>	1969
<b>Post High School Education:</b>	California State University San Diego; BA, Economics; 1995
<b>Business Background:</b>	6/2020 to Present: Deputy Chief Investment Officer – Chandler Asset Management, Inc. 2016 to 2020: EVP, Portfolio Manager & Principal – Chandler Asset Management, Inc. 2010 to 2015: SVP, Portfolio Manager & Principal – Chandler Asset Management, Inc. 2009 to 2010: VP, Portfolio Manager & Principal – Chandler Asset Management, Inc. 2003 to 2009: VP, Portfolio Manager – Chandler Asset Management, Inc.
<b>Professional Designations:</b>	Chartered Financial Analyst (CFA); CFA Institute; 2003 <i>For an explanation of the CFA designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Jayson Schmitt. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- Jayson Schmitt is not engaged in any other investment-related activities.
- Jayson Schmitt does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- Jayson Schmitt is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

Jayson Schmitt does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Martin Cassell
<b>Title:</b>	CEO & Chief Investment Officer
<b>Phone Number:</b>	(858) 546-3737

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### William Dennehy II, CFA

##### Deputy Chief Investment Officer

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about William Dennehy II that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

*Additional information about William Dennehy II is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	William Dennehy II
<b>Year of Birth:</b>	1970
<b>Post High School Education:</b>	California State University Chico; BS, Business/Finance; 1992
<b>Business Background:</b>	6/2020 to Present: Deputy Chief Investment Officer – Chandler Asset Management, Inc. 2016 to 2020: EVP, Portfolio Manager – Chandler Asset Management, Inc. 2012 to 2015: SVP, Portfolio Manager – Chandler Asset Management, Inc. 2011 to 2012: VP, Portfolio Manager – Chandler Asset Management, Inc. 2001 to 3/2011: Senior Portfolio Manager – Northern Trust Global Investments
<b>Professional Designations:</b>	Chartered Financial Analyst (CFA); CFA Institute; 2000 <i>For an explanation of the CFA designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of William Dennehy II. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- William Dennehy II is not engaged in any other investment-related activities.
- William Dennehy II does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- William Dennehy II is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

William Dennehy II does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Martin Cassell
<b>Title:</b>	CEO & Chief Investment Officer
<b>Phone Number:</b>	(858) 546-3737

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Scott Prickett, CTP

##### Deputy Chief Investment Officer

Chandler Asset Management, Inc.  
 801 2<sup>nd</sup> Avenue, Suite 800  
 Seattle, WA 98104  
 (800) 317-4747

Chandler Asset Management, Inc.  
 1875 Lawrence Street, Suite 920  
 Denver, CO 80202  
 (800) 317-4747

*This brochure supplement provides information about Scott Prickett that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Scott Prickett is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Scott David Prickett
<b>Year of Birth:</b>	1963
<b>Post High School Education:</b>	University of Northern Colorado; BS, Business Finance; 1987
<b>Business Background:</b>	06/2020 to Present: Deputy Chief Investment Officer – Chandler Asset Management, Inc. 01/2016 to 05/2020: EVP, Portfolio Strategist – Chandler Asset Management, Inc. 04/2014 to 12/2015: SVP, Portfolio Strategist – Chandler Asset Management, Inc. 05/2006 to 04/2014: SVP, Managing Director, Portfolio Manager – Davidson Fixed Income Mgmt. Inc. 05/2006 to 04/2014: SVP, Managing Director - D.A. Davidson & Co.
<b>Professional Designations:</b>	Certified Treasury Professional (CTP); Association of Financial Professionals; 2000 <i>For an explanation of the CTP designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Scott Prickett. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- Scott Prickett is not engaged in any other investment-related activities.
- Scott Prickett does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- Scott Prickett is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

Scott Prickett does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Martin Cassell
<b>Title:</b>	CEO & Chief Investment Officer
<b>Phone Number:</b>	(858) 546-3737

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Julie Hughes

##### Senior Portfolio Strategist

Chandler Asset Management, Inc.  
 1875 Lawrence Street, Suite 920  
 Denver, CO 80202  
 (800) 317-4747

*This brochure supplement provides information about Julie Hughes that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

Additional information about Julie Hughes is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Julie Kirschner Hughes
<b>Year of Birth:</b>	1964
<b>Post High School Education:</b>	University of Texas at Austin; BBA, Marketing; 1986 The Wharton School of the University of Pennsylvania; MBA, Entrepreneurial Management; 1992
<b>Business Background:</b>	06/2020 to Present: Senior Portfolio Strategist – Chandler Asset Management, Inc. 01/2016 to 05/2020: SVP, Portfolio Strategist – Chandler Asset Management, Inc. 04/2014 to 12/2015: VP, Portfolio Strategist – Chandler Asset Management, Inc. 08/2007 to 04/2014: SVP, Portfolio Manager – Davidson Fixed Income Management
<b>Professional Designations:</b>	None

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Julie Hughes. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. **Investment-Related Activities**

- Julie Hughes is not engaged in any other investment-related activities.
- Julie Hughes does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. **Non-Investment-Related Activities**

- Julie Hughes is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time.

### ITEM 5: ADDITIONAL COMPENSATION

Julie Hughes does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Scott Prickett
<b>Title:</b>	Deputy Chief Investment Officer
<b>Phone Number:</b>	(800) 317-4747

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Genny Lynkiewicz, CFA

##### Senior Portfolio Manager

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about Genny Lynkiewicz that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*



Additional information about Genny Lynkiewicz is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Genevieve Cathryn Lynkiewicz
<b>Year of Birth:</b>	1974
<b>Post High School Education:</b>	University of Wisconsin, Madison; BBA, Finance, Investment & Banking; 1997
<b>Business Background:</b>	06/2020 to Present: Senior Portfolio Manager – Chandler Asset Management, Inc. 10/2015 to 05/2020: VP, Portfolio Manager – Chandler Asset Management, Inc. 08/2012 to 02/2015: VP, Fixed Income Portfolio Manager – BMO Asset Management Corp. 02/2012 to 08/2012: Fixed Income Portfolio Manager – M&I Investment Management Corp.
<b>Professional Designations:</b>	Chartered Financial Analyst (CFA); CFA Institute; 2006 <i>For an explanation of the CFA designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Genny Lynkiewicz. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. *Investment-Related Activities*

- Genny Lynkiewicz serves as the CFO/Treasurer for the San Diego Peace Corps Association. Ms. Lynkiewicz devotes approximately 4-5 hours a month to this activity.
- Genny Lynkiewicz does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. *Non-Investment-Related Activities*

- Genny Lynkiewicz is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of her time.

### ITEM 5: ADDITIONAL COMPENSATION

Genny Lynkiewicz does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Jayson Schmitt
<b>Title:</b>	Deputy Chief Investment Officer
<b>Phone Number:</b>	(858) 546-3737



## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Carlos Oblites

##### Senior Portfolio Strategist

Chandler Asset Management, Inc.  
 7250 Redwood Boulevard, Suite 300  
 Novato, CA 94945  
 (800) 317-4747

*This brochure supplement provides information about Carlos Oblites that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

Additional information about Carlos Oblites is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Carlos Oblites
<b>Year of Birth:</b>	1969
<b>Post High School Education:</b>	University of CA, Santa Barbara; BA, History; 1990 San Francisco State University; MBA; 2003
<b>Business Background:</b>	06/2020 to Present: Senior Portfolio Strategist – Chandler Asset Management, Inc. 01/2017 to 05/2020: SVP, Portfolio Strategist – Chandler Asset Management, Inc. 09/2015 to 01/2017: Administrative Services Manager – Central Marin Sanitation Agency 05/2007 to 09/2015: Director – PFM Asset Management
<b>Professional Designations:</b>	None

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Carlos Oblites. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### A. **Investment-Related Activities**

- Carlos Oblites is not engaged in any other investment-related activities.
- Carlos Oblites does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### B. **Non-Investment-Related Activities**

- Carlos Oblites is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

Carlos Oblites does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Scott Prickett
<b>Title:</b>	Deputy Chief Investment Officer
<b>Phone Number:</b>	(800) 317-4747

## Part 2B of Form ADV: *Brochure Supplement*

**Effective Date: October 23, 2020**

### ITEM 1: COVER PAGE

#### Christopher McCarry, AIF

##### Senior Portfolio Strategist

Chandler Asset Management, Inc.  
 6225 Lusk Boulevard  
 San Diego, CA 92121  
 (800) 317-4747

*This brochure supplement provides information about Christopher McCarry that supplements the Chandler Asset Management (Chandler) brochure. You should have received a copy of that brochure. Please contact Nicole Dragoo if you did not receive Chandler's brochure or if you have any questions about the contents of this supplement.*

*Additional information about Christopher McCarry is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).*



### ITEM 2: EDUCATIONAL BACKGROUND & BUSINESS EXPERIENCE

<b>Full Legal Name:</b>	Christopher McCarry
<b>Year of Birth:</b>	1979
<b>Post High School Education:</b>	Bucknell University; BA, International Relations and Spanish; 2001
<b>Business Background:</b>	06/2020 to Present: Senior Portfolio Strategist – Chandler Asset Management, Inc. 09/2019 to 05/2020: SVP, Portfolio Strategist – Chandler Asset Management, Inc. 07/2013 to 09/2019: SVP, Investment Consultant – Chandler Asset Management, Inc.
<b>Professional Designations:</b>	Accredited Investment Fiduciary (AIF®); Center for Fiduciary Studies; 2008 <i>For an explanation of the AIF® designation, please see page 12</i>

### ITEM 3: DISCIPLINARY INFORMATION

Chandler is required to disclose all material facts regarding any legal or disciplinary events that would materially impact a client's evaluation of Christopher McCarry. No events have occurred that are applicable to this item.

### ITEM 4: OTHER BUSINESS ACTIVITIES

Chandler is required to disclose any outside business activities or occupation for compensation that could potentially create a conflict of interest with clients.

#### C. *Investment-Related Activities*

- Christopher McCarry is not engaged in any other investment-related activities.
- Christopher McCarry does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

#### D. *Non-Investment-Related Activities*

- Christopher McCarry is not engaged in any other business or occupation that provides substantial compensation or involves a substantial amount of his time.

### ITEM 5: ADDITIONAL COMPENSATION

Christopher McCarry does not receive any economic benefit from a non-advisory client for the provision of advisory services.

### ITEM 6: SUPERVISION

<b>Supervisor:</b>	Scott Prickett
<b>Title:</b>	Deputy Chief Investment Officer
<b>Phone Number:</b>	(800) 317-4747

### Explanations of Professional Designations Held

## CFA Charter

The Chartered Financial Analyst (CFA) charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA Institute — the largest global association of investment professionals. There are currently more than 100,000 CFA charterholders working throughout the world. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

### *High Ethical Standards*

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charterholders to:

- Place their clients' interests ahead of their own
- Maintain independence and objectivity
- Act with integrity
- Maintain and improve their professional competence
- Disclose conflicts of interest and legal matters

### *Global Recognition*

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of many of the advanced skills needed for investment analysis and decision making in today's quickly evolving global financial industry. As a result, employers and clients are increasingly seeking CFA charterholders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in 19 countries recognize the CFA charter as a proxy for meeting certain licensing requirements, and more than 125 colleges and universities around the world have incorporated a majority of the CFA Program curriculum into their own finance courses.

### *Comprehensive and Current Knowledge*

The CFA Program curriculum provides a comprehensive framework of knowledge for investment decision making and is firmly grounded in the knowledge and skills used every day in the investment profession. The three levels of the CFA Program test a proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed-income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA charter, visit [www.cfainstitute.org](http://www.cfainstitute.org).

## Certified Treasury Professional (CTP)

The Certified Treasury Professional® (CTP) designation is evidence that an individual is certified in corporate treasury and cash management. The credential is awarded based upon experience and passing of a rigorous examination that provides an objective measure of an individual's broad-based knowledge and competency in treasury management. Ongoing professional development is required in order to maintain the credential. The CTP is administered by the Association for Financial Professionals, the leading association for treasury and financial management professionals, with more than 29,000 members worldwide.

## Accredited Investment Fiduciary (AIF®)

The Accredited Investment Fiduciary (AIF®) Designation is a professional certification that demonstrates an advisor or other person serving as an investment fiduciary has met certain requirements to earn and maintain the credential. The purpose of the Accredited Investment Fiduciary (AIF®) Designation is to assure that those responsible for managing or advising on investor assets have a fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility.

Initial certification requires completion of AIF® training, passing of the AIF® examination, meeting the education and industry experience requirements, and satisfaction of the Code of Ethics and Conduct Standards. To maintain the designation, designees must complete six (6) hours of continuing education and satisfy the Code of Ethics and Conduct Standards annually. The AIF® is administered by the Center for Fiduciary Studies.



# FACTS

## WHAT DOES CHANDLER ASSET MANAGEMENT, INC. DO WITH YOUR PERSONAL INFORMATION?

### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and investment experience
- Account balances and transaction history
- Assets and income

When you are *no longer* our customer, we continue to share your information as described in this notice.

### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Chandler chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Chandler share?	Can you limit this sharing?
<b>For our everyday business purposes—</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes—</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your transactions and experiences	No	We do not share
<b>For our affiliates' everyday business purposes—</b> information about your creditworthiness	No	We do not share
<b>For our affiliates to market to you</b>	No	We do not share
<b>For non-affiliates to market to you</b>	No	We do not share

### Questions?

Call (858) 546-3737 or go to [www.chandlerasset.com](http://www.chandlerasset.com)

## What we do

<b>How does Chandler protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
<b>How does Chandler collect my personal information?</b>	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>■ Open an account or enter into an investment advisory agreement</li> <li>■ Give us your income information and your contact information</li> <li>■ Tell us about your investment or retirement portfolio</li> </ul> <p>We also collect your personal information from other companies</p>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>■ sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>■ affiliates from using your information to market to you</li> <li>■ sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]</p>

## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Chandler Asset Management, Inc. has no affiliates.</i></li> </ul>
<b>Non-affiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Chandler Asset Management, Inc. does not share with non-affiliates so they can market to you</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Chandler Asset Management, Inc. doesn't jointly market.</i></li> </ul>

## Other important information

### Information for Vermont, California and Nevada Customers

In response to a Vermont regulation, if we disclose personal information about you to non-affiliated third parties with whom we have joint marketing agreements, we will only disclose your name, address, other contact information, and information about our transactions or experiences with you.

In response to a California law, we automatically treat accounts with California billing addresses as if you do not want to disclose personal information about you to non-affiliated third parties except as permitted by the applicable California law. We will also limit the sharing of personal information about you with affiliates to comply with all California privacy laws that apply to us.

Nevada law requires us to disclose that you may request to be placed on our "do not call" list at any time by calling 1-831-759-6300. To obtain further information, contact the Bureau of Consumer Protection, Office of the Nevada Attorney General at 555 E. Washington Ave., Suite 3900, Las Vegas, NV 88101; phone 1-702-486-3132; email

[BCPINFO@ag.state.nv.us](mailto:BCPINFO@ag.state.nv.us)



## **Appendix B**

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### **State of Florida Registration as a Corporation**

**2020 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P14000058656

**Entity Name:** CHANDLER ASSET MANAGEMENT, INC.**Current Principal Place of Business:**6225 LUSK BLVD  
SAN DIEGO, CA 92121**Current Mailing Address:**6225 LUSK BLVD  
SAN DIEGO, CA 92121**FEI Number:** 33-0570869**Certificate of Status Desired:** No**Name and Address of Current Registered Agent:**NRAI SERVICES, INC  
1200 SOUTH PINE ISLAND ROAD  
PLANTATION, FL 33324 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:**\_\_\_\_\_  
Electronic Signature of Registered Agent\_\_\_\_\_  
Date**Officer/Director Detail :**

Title	CHAIR OF THE BOARD
Name	CHANDLER, KAY
Address	6225 LUSK BLVD
City-State-Zip:	SAN DIEGO CA 92121

Title	SEC
Name	DRAGOO, NICOLE
Address	6225 LUSK BLVD
City-State-Zip:	SAN DIEGO CA 92121

Title	PRESIDENT, CFO
Name	CASELL, MARTIN
Address	6225 LUSK BLVD
City-State-Zip:	SAN DIEGO CA 92121

Title	DIRECTOR OF THE BOARD
Name	SCHMITT, JAYSON
Address	6225 LUSK BLVD
City-State-Zip:	SAN DIEGO CA 92121

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** MARTIN CASELL**PRESIDENT****01/21/2020**\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail\_\_\_\_\_  
Date



## Appendix C

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### Professional Biographies



## Investment Management



**Martin Cassell, CFA**

*CEO, Chief Investment Officer*

Martin Cassell is the Chief Executive and Investment Officer at Chandler Asset Management and is a principal of the firm. He is responsible for defining, planning, and directing company programs. Martin heads implementation of the firm's investment strategies and portfolio risk management. He designed the proprietary quantitative models that drive our investment process, establishing duration, structure, and asset allocation throughout client portfolios.

Martin joined Chandler in 1991 from the City of San Diego where he managed a \$1 billion fixed income portfolio. He began his investment career in 1987 managing portfolios at World Savings and Loan.

Martin received his B.S. in finance from California State University, Hayward. He is a member of the CFA Society of San Diego and holds the designation of Chartered Financial Analyst. Martin is also a member of the Government Finance Officers Association (GFOA) Treasury and Investment Committee (TIM) and the California Association of Joint Power Authorities (CAJPA) finance committee.



**William Dennehy II, CFA**

*Deputy Chief Investment Officer*

William Dennehy is Deputy Chief Investment Officer at Chandler Asset Management. He is responsible for implementing portfolio strategy and securities trading in client accounts and serves as Co-Chair of the firm's Economic and Market Analysis Committee and Credit Committee.

Prior to joining Chandler in 2011, Bill worked at Northern Trust Global Investments in Chicago, most recently as senior portfolio manager and vice president, with a wide range of responsibilities in asset allocation, quantitative and qualitative analysis.

Bill earned his B.S. in business administration, option in finance, at California State University, Chico. He holds the designation of Chartered Financial Analyst.



**Scott Prickett, CTP**

*Deputy Chief Investment Officer*

Scott Prickett is Deputy Chief Investment Officer. He is responsible for building and maintaining client relationships with a focus upon developing and enhancing client investment programs. Scott actively participates in the portfolio management process and meets with clients on a regular basis to review their accounts, portfolio activity, portfolio strategy and financial markets. Scott has over 30 years of investment industry experience focused largely on managing short-term fixed income strategies for governmental and institutional non-profit clients. Scott serves as Co-Chair of the firm's *Economic and Market Analysis Committee*.

Prior to joining Chandler, Scott was Managing Director and Portfolio Manager at Davidson Fixed Income Management. Scott was directly responsible for managing over \$750 million in client assets and had management responsibilities over multiple business units with combined total assets of over \$5 billion. These included taxable and tax-exempt SMA programs, a Local Government Investment Pool (LGIP) and SeaCap Investment Advisors. At ALPS Mutual Fund Services, Scott played a key role in developing two SEC registered mutual funds. Scott also



spent two years at Pacific Investment Management Company (PIMCO) as a fixed income Portfolio Specialist for over \$1.4 billion in assets.

Scott is a graduate of the University of Northern Colorado with a degree in business administration with an emphasis in finance. Scott has earned the Association of Financial Professionals designation as a Certified Treasury Professional (CTP) and is a frequent speaker for various local and national organizations.



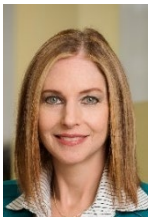
**Jayson Schmitt, CFA**

*Deputy Chief Investment Officer*

Jayson Schmitt is Deputy Chief Investment Officer. Jayson is instrumental in the development and integration of quantitative analytic tools for the portfolio management process and provides full-time oversight of the entire investment management team and the implementation of the firm's strategies. He serves on the firm's Executive Committee, as well as Co-Chair of the *Quantitative Analysis Committee, Sector Committee, and Multi Asset Class Committee*.

Prior to joining Chandler in 1995, Jayson was employed as a Financial Analyst with USA Federal Credit Union in San Diego, managing a \$100 million liquidity book. His responsibilities there also included asset/liability management.

Jayson earned his B.A. in economics from San Diego State University. He is a member of the CFA Society of San Diego and holds the designation of Chartered Financial Analyst. Jayson also is a member of the City of San Diego Investment Advisory Committee. The committee assists the City with its investment program by providing regular policy and portfolio reviews.



**Julie Hughes**

*Senior Portfolio Strategist*

Julie Hughes is a Senior Portfolio Strategist at Chandler Asset Management. She is responsible for building and maintaining client relationships with public agencies along with participating actively in the portfolio management process. Julie has over 25 years of finance, strategy, and client relationship management experience.

Prior to joining Chandler, Julie was a Portfolio Manager at Davidson Fixed Income Management, where she managed short-term fixed income portfolios for government and non-profit clients. Julie also has deep expertise in the investment of tax-exempt bond proceeds and hedging interest rate risk for municipal debt. Prior to 2004, she held positions in corporate strategy and management consulting.

Julie earned an MBA from the Wharton School of the University of Pennsylvania and a BBA in Marketing from the University of Texas at Austin.



**Christopher McCarry, AIF**

*Senior Portfolio Strategist*

Christopher McCarry joined Chandler Asset Management in 2013 and is a Senior Portfolio Strategist. Chris is a member of the Investment Management Team and participates actively in the portfolio management process as well as builds and maintains client relationships. As a portfolio strategist, Chris focuses on identifying and communicating key investment related themes and trends for implementation into fixed income strategies for local government and institutional clients. Prior to joining the Investment Management Team in 2019, Chris was an Investment Consultant for the Client Services Team at Chandler. Chris has worked in the investment industry since 2001 with a diverse background in financial services.



In his most recent role prior to Chandler, he was the Regional Vice President for Zack's Investment Management focusing on retail sales for the West Coast Territory. Other roles include an Advisory Consultant at LPL Financial and he began his career at Penn Mutual Life.

Chris is a graduate of Bucknell University with his BA in both International Relations (Latin America Focus) and Spanish. He holds his Accredited Investment Fiduciary (AIF®) designation.



**Carlos Oblites**  
*Senior Portfolio Strategist*

Carlos Oblites is a Senior Portfolio Strategist at Chandler Asset Management. He is responsible for building and maintaining client relationships with public agencies along with participating actively in the portfolio management process. Carlos has 24 years of investment and financial experience focused largely on managing short-term fixed income and pension strategies for governmental and institutional non-profit clients, and currently serves as Co-Chair of the firm's *Multi Asset Class Committee*.

Prior to joining Chandler, Carlos served as the Administrative Services Manager at Central Marin Sanitation Agency (CMSA), and was responsible for all aspects of the Agency's financial, human resources, administrative support, and information systems activities. He also has significant expertise in serving California public agencies, healthcare, and insurance clients through his roles as Director at PFM Asset Management, and as a Principal at Wells Capital Management. Previous responsibilities include managing a variety of institutional client relationships and developing, implementing, and monitoring customized investment strategies for operating funds, bond proceeds, pension, and post-retirement funds. Carlos has also worked as a marketing/research consultant with Wells Fargo Bank and as teacher for the Long Beach Unified School District.

Carlos holds a Bachelor of Arts degree in History from the University of California, Santa Barbara, and earned a Master's degree in Business Administration from San Francisco State University.



**Ted Piorkowski, CFA**  
*Senior Portfolio Manager*

Ted Piorkowski is a Senior Portfolio Manager at Chandler Asset Management. In addition to his duties as a portfolio manager, he oversees daily trading and is responsible for implementing portfolio strategy. Ted leads the Economic and Market Analysis Committee, as well as the Sector Committee.

Prior to joining Chandler in 1999, Ted served as a Vice President and Fund Manager for Sefton Capital Management. He was responsible for the management of over \$300 million in both mutual fund vehicles and individually managed institutional portfolios. From 1988 through 1994, Ted managed money market and enhanced money market funds for San Diego Trust and Savings Bank and its successor, San Diego Financial Capital Management.

Ted earned both his B.S. and M.B.A. in finance from San Diego State University. He is a member of the CFA Society of San Diego and holds the designation of Chartered Financial Analyst.





**Shelly Henbest, CFA**  
*Senior Credit Analyst*

Shelly Henbest joined Chandler Asset Management as a Credit Analyst in 2009. She is actively involved in analyzing and assessing the credit suitability of debt issuers and assisting portfolio managers in the portfolio management process. Shelly serves as Co-Chair of the firm's *Credit Committee* and is responsible for monitoring developments in the financial markets and providing fundamental economic and investment research.

Shelly has more than 15 years of experience in financial research and analysis. Previously, she was an Associate Analyst at Bear, Stearns & Co. Inc., focusing on the consumer/retail sector. Prior to joining Bear Stearns, Shelly was an Equity Research Associate at C.L. King & Associates. She began her career at Ford Equity Research in San Diego as a Quantitative Equity Analyst. Shelly was a three-year member of Institutional Investor magazine's "All-America Research Team."

Shelly earned her B.A. in business economics from the University of California, Santa Barbara and holds the designation of Chartered Financial Analyst.



**Genny Lynkiewicz, CFA**  
*Senior Portfolio Manager*

Genny Lynkiewicz is a Senior Portfolio Manager at Chandler Asset Management. She is responsible for implementing portfolio strategy and securities trading in client accounts, and currently serves as Co-Chair of the firm's *Sector Committee*. Prior to joining Chandler in 2015, Genny worked at BMO Asset Management in Chicago where she managed over \$8 billion in taxable money market funds, securities lending portfolios and separately managed accounts.

Genny earned a B.B.A. in Finance, Investment & Banking and a Certificate in International Business from the University of Wisconsin, Madison. She holds the designation of Chartered Financial Analyst.



**Devin Weinstein, CFA**  
*Assistant Portfolio Manager*

Devin Weinstein is an Assistant Portfolio Manager at Chandler Asset Management. He is responsible for assisting the portfolio management team with analysis of individual securities, researching portfolios and transacting securities on behalf of the portfolio managers. Devin joined Chandler Asset Management in 2018.

Previously, Devin worked as an Equity Research Analyst at Ford Equity Research, a quant firm in San Diego. Prior to working at Ford, he led a financial advising practice at Northwestern Mutual. Devin graduated Magna Cum Laude from the University of Miami in 2015 with his B.S. in finance and economics. He holds the designation of Chartered Financial Analyst.



## Relationship Management and Client Service



**Mel Hamilton**

*Senior Relationship Manager*

Mel Hamilton is a *Senior Relationship Manager* at Chandler Asset Management. He is responsible for developing and servicing institutional client relationships in the Southeast, including public agencies, healthcare organizations, higher education, insurance funds, and special districts. Mel has 28 years of investment industry experience that has focused on developing and enhancing investment programs encompassing fixed income and equity strategies for government and institutional clients.

Mel joined the firm in 2014. Prior to joining Chandler, Mel was a Senior Vice President at Davidson Fixed Income Management where he served as a Director of Client Services. He was also a Senior Managing Consultant at PFM Asset Management where he led the firm's efforts in the Southeast for public agencies, healthcare, higher education, and insurance funds. He also previously worked at Trusco Capital Management where he led not for profit institutional sales in Florida.

Mel is a graduate of the University of Virginia, McIntire School of Commerce, with his B.S. in Business Administration. He also currently holds FINRA Series 7, 63 and 66 licenses.



**Stacey Alderson, CTP**

*Senior Client Service Manager*

Stacey Alderson joined Chandler Asset Management in 2014 and is Senior Client Service Manager. In her role, Stacey serves as a liaison between clients and the Chandler team to facilitate the onboarding of new client accounts, proactively schedule client meetings, maintain existing client relationships, create and distribute client reports, and respond to client-generated requests. In addition, Stacey has significant expertise in assisting clients with cash flow analysis and in developing and maintaining cash flow projections within their treasury management operations.

Stacey began working in the financial services industry in 1998 through positions in both banking and asset management. She earned her B.A. in business administration with an emphasis in accounting from the University of Montevallo. Stacey has received the AFP designation as a Certified Treasury Professional (CTP).



## Operations and Compliance



**Nicole Dragoo, IAACP**

*COO, Chief Compliance Officer*

Nicole Dragoo joined the firm in December 2001 and assumed the roles of Chief Operating and Compliance Officer in 2008. She is responsible for regulatory compliance and legal matters and implements and oversees the firm's operational and administrative functions. Nicole also directly oversees the investment operations department, which is responsible for maintaining data integrity, trade settlement, performance calculation, client reporting and portfolio accounting.

Nicole held various roles working in and managing operations and compliance prior to accepting the responsibilities of COO and CCO. Before joining Chandler, Nicole served as a Trading Associate on the institutional fixed income sales desk at Merrill Lynch.

Nicole earned her B.A. from the University of San Diego in business economics and her J.D. from the University of San Diego School of Law. She is a member of the State Bar of California, the American Bar Association, the San Diego County Bar Association and is active contributor in the Southern California Compliance Group (SCCG). Additionally, Nicole holds the designation of Investment Adviser Certified Compliance Professional (IACCP®). Nicole was named the 2017 Governance Professional of the Year (small to mid-cap) by Corporate Secretary.



**Michael Ramos**

*Operations Director*

Michael Ramos is Operations Director at Chandler Asset Management. He is responsible for leading the Investment Operations team and manages the firm's financial systems. Mike oversees trade processing, trade settlements, investment accounting, account reconciliation, market data, data integrity, systems administration, and client reporting. He joined Chandler Asset Management in 2004 as an Operations Associate. His previous experience includes financial accounting and reporting.

Mike earned his B.S. in business administration with a specialization in finance from California State University, San Marcos in 2003. In 2009, he received his M.B.A. in finance from National University.



## **Appendix D**

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# **Global Investment Performance Standards (GIPS®) and Verification Letter**



## Verification Report

Chandler Asset Management, Inc.  
6225 Lusk Boulevard  
San Diego, CA 92121

We have verified whether Chandler Asset Management, Inc. (the "Firm") has, for the periods from July 1, 1997 through March 31, 2020, established policies and procedures for complying with the Global Investment Performance Standards (GIPS®) related to composite and pooled fund maintenance and the calculation, presentation, and distribution of performance that are designed in compliance with the GIPS standards, as well as whether these policies and procedures have been implemented on a firm-wide basis. GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein.

The Firm's management is responsible for its claim of compliance with the GIPS standards and the design and implementation of its policies and procedures. Our responsibilities are to be independent from the Firm and to express an opinion based on our verification. We conducted this verification in accordance with the required verification procedures of the GIPS standards, which includes testing performance on a sample basis. We also conducted such other procedures as we considered necessary in the circumstances.

In our opinion, for the periods from July 1, 1997 through March 31, 2020, the Firm's policies and procedures for complying with the GIPS standards related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been, in all material respects:

- Designed in compliance with the GIPS standards, and
- Implemented on a firm-wide basis.

This report does not relate to or provide assurance on any specific performance report of the Firm or on the operational effectiveness of the Firm's controls or policies and procedures for complying with the GIPS standards.

*Adviser Compliance Associates, LLC*

Adviser Compliance Associates, LLC  
ACA Performance Services Division  
October 22, 2020

# GIPS® Composite Report: Ultra Short Bond



## Annual Rates of Return 2009 through 2019

Year	Returns			3 Year Annualized		Dispersion		Assets		
	Total	Total		Standard Deviation		Asset Wtd	Number of	Composite	% of Firm	Firm
End	Gross	Net	Index	Composite	Index	Std. Dev.	Portfolios	(MM)	Assets	(MM)
2009	1.35%	1.10%	0.55%	n/a	n/a	0.14%	6	158	3.19%	4,965
2010	1.51%	1.25%	1.08%	n/a	n/a	0.12%	6	114	1.99%	5,755
2011	0.81%	0.56%	0.73%	0.45%	0.42%	≤5	≤5	119	2.01%	5,929
2012	0.74%	0.49%	0.26%	0.37%	0.31%	≤5	≤5	77	1.20%	6,431
2013	0.39%	0.14%	0.22%	0.25%	0.21%	≤5	≤5	58	0.81%	7,165
2014	0.46%	0.20%	0.29%	0.22%	0.17%	≤5	≤5	74	0.83%	8,894
2015	0.46%	0.21%	0.30%	0.23%	0.23%	≤5	≤5	62	0.53%	11,747
2016	0.97%	0.71%	0.65%	0.30%	0.32%	≤5	≤5	80	0.62%	12,882
2017	0.99%	0.74%	0.71%	0.29%	0.32%	0.09%	≤5	86	0.63%	13,698
2018	1.97%	1.72%	1.77%	0.34%	0.40%	0.05%	≤5	59	0.35%	16,551
2019	3.29%	3.04%	2.88%	0.44%	0.47%	≤5	≤5	66	0.34%	19,552

Chandler Asset Management claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards.

Chandler Asset Management has been independently verified by ACA Performance Services for the period of July 1, 1997 through March 31, 2020. The verification report is available upon request. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. Verification does not provide assurance on the accuracy of any specific performance report.

- Chandler Asset Management is an independent investment adviser registered as such with the Securities and Exchange Commission under the Investment Adviser's Act of 1940. Registration with the SEC does not imply a certain level of skill or training. Since 1988, Chandler Asset Management has provided fixed income investment management services to the public sector, as well as to foundations, endowments, individuals and corporations. A complete list and description of all of the firm's composites is available upon request.
- The Ultra Short Bond Composite is a composite of individually managed accounts with an average modified duration approximately equal to the modified duration of the ICE Bank of America Merrill Lynch Blended 0-3 year Treasury Index and a maximum final stated maturity of individual securities of three years. The minimum account size required to be included in this composite is \$2 million. This composite was created in November 1988. The name of this composite was changed from Principal Preservation effective June 30, 2009.
- The ICE BAML Blended 0-3 Year US Treasury Index is a static, internally maintained benchmark comprised of US dollar denominated sovereign debt publicly issued by the US government in its domestic market. Effective 1/1/2001, it consists of the following indices: (30%) ICE BAML US 3-Month Treasury Bill Index, (30%) ICE BAML US 6-Month Treasury Bill Index, (40%) ICE BAML 1-3 Year US Treasury Index. Qualifying securities will include 3 and 6-month Treasury Bills and US Treasury securities that must have at least one year remaining term to final maturity and less than three years remaining term to final maturity, a fixed coupon schedule, and a minimum amount outstanding of \$1 billion. Qualifying securities must have at least 18 months to final maturity at the time of issuance. \*Prior to 1/1/2001 it consisted of (100%) ICE BAML US 1-Year Treasury Bill Index, G003. Indexes are referred to for comparative purposes only and are not intended to parallel the risk or investment style of the portfolios in the Composite. Indexes do not utilize leverage. Index calculations do not reflect fees, brokerage commissions or other expenses of investing. Investors may not make direct investments into any index. Index data contained herein (and all trademarks related thereto) are owned by the indicated index provider, and may not be redistributed. The information herein has not been approved by the index provider.
- Valuations are computed and performance reported in U.S. Dollars.
- Performance is calculated using a time-weighted total rate of return, which links performance monthly, and is reported gross of investment management fees and custodial fees, but after all trading expenses. Results reflect the reinvestment of income, dividends and other earnings, and include realized and unrealized gains and losses and interest accrued through the last day of each month. Results do not reflect the potential impact of taxes. Past performance is not indicative of future results. Fees charged by Chandler Asset Management will reduce performance.
- Net-of-fees performance returns are calculated by reducing the monthly gross performance by one-twelfth (1/12) of the actual maximum applicable fee of 0.25%, which is representative of our current fee schedule for this composite. These monthly returns are then geometrically linked to produce annual returns which are presented before custodial fees but after management fees and all trading expenses. Fees are negotiable and additional information regarding Chandler's fees is included in our Part 2A of Form ADV.
- Dispersion is calculated using the asset weighted standard deviation of annual gross returns of those portfolios that were included in the composite for the entire year. For years when less than six portfolios were included in the composite for the full year, no dispersion measure is presented. The three-year annualized standard deviation measures the variability of the composite gross returns and the benchmark returns over the preceding 36-month period. Policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
- GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein.

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# GIPS® Composite Report: Limited Maturity



## Annual Rates of Return 2009 through 2019

Year	Returns			3 Year Annualized		Dispersion		Assets		
	Total	Total		Standard Deviation		Asset Wtd	Number of	Composite	% of Firm	Firm
End	Gross	Net	Index	Composite	Index	Std. Dev.	Portfolios	(MM)	Assets	(MM)
2009	2.10%	1.85%	0.78%	n/a	n/a	0.34%	9	224	4.51%	4,965
2010	2.96%	2.70%	2.35%	n/a	n/a	0.38%	8	201	3.50%	5,755
2011	1.88%	1.62%	1.55%	1.02%	1.02%	0.31%	9	222	3.74%	5,929
2012	1.16%	0.91%	0.43%	0.78%	0.73%	0.06%	15	474	7.37%	6,431
2013	0.30%	0.05%	0.36%	0.59%	0.50%	0.08%	18	797	11.12%	7,165
2014	0.87%	0.61%	0.62%	0.54%	0.43%	0.09%	21	879	9.88%	8,894
2015	0.74%	0.49%	0.54%	0.63%	0.56%	0.07%	27	1,328	11.31%	11,747
2016	1.11%	0.86%	0.88%	0.74%	0.76%	0.06%	31	1,081	8.39%	12,882
2017	0.85%	0.60%	0.43%	0.71%	0.74%	0.08%	32	1,178	8.60%	13,698
2018	1.69%	1.44%	1.59%	0.77%	0.85%	0.03%	31	1,905	11.51%	16,551
2019	3.87%	3.61%	3.55%	0.84%	0.94%	0.08%	39	2,653	13.57%	19,552

Chandler Asset Management claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards.

Chandler Asset Management has been independently verified by ACA Performance Services for the period of July 1, 1997 through March 31, 2020. The verification report is available upon request. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. Verification does not provide assurance on the accuracy of any specific performance report.

1. Chandler Asset Management is an independent investment adviser registered as such with the Securities and Exchange Commission under the Investment Adviser's Act of 1940. Registration with the SEC does not imply a certain level of skill or training. Since 1988, Chandler Asset Management has provided fixed income investment management services to the public sector, as well as to foundations, endowments, individuals and corporations. A complete list and description of all of the firm's composites is available upon request.
2. The Limited Maturity Composite is a composite of individually managed accounts with an average modified duration approximately equal to the modified duration of the ICE Bank of America Merrill Lynch 1-3 Year US Treasury Index and a final stated maturity of individual securities of five years. The minimum account size required to be included in this composite is \$2 million. This composite was created September 1988. The name of this composite was changed from Short-Term Fixed Income effective June 30, 2009.
3. The ICE BAML 1-3 Year US Treasury Index tracks the performance of US dollar-denominated sovereign debt publicly issued by the US government in its domestic market. Qualifying securities must have at least one year remaining term to final maturity and less than three years remaining term to final maturity, a fixed coupon schedule, and a minimum amount outstanding of \$1 billion. Qualifying securities must have at least 18 months to final maturity at the time of issuance. Indexes are referred to for comparative purposes only and are not intended to parallel the risk or investment style of the portfolios in the Composite. Indexes do not utilize leverage. Index calculations do not reflect fees, brokerage commissions or other expenses of investing. Investors may not make direct investments into any index. Index data contained herein (and all trademarks related thereto) are owned by the indicated index provider, and may not be redistributed. The information herein has not been approved by the index provider.
4. Valuations are computed and performance reported in U.S. Dollars.
5. Performance is calculated using a time-weighted total rate of return, which links performance monthly, and is reported gross of investment management fees and custodial fees, but after all trading expenses. Results reflect the reinvestment of income, dividends and other earnings, and include realized and unrealized gains and losses and interest accrued through the last day of each month. Results do not reflect the potential impact of taxes. Past performance is not indicative of future results. Fees charged by Chandler Asset Management will reduce performance.
6. Net-of-fees performance returns are calculated by reducing the monthly gross performance by one-twelfth (1/12) of the actual maximum applicable fee of 0.25%, which is representative of our current fee schedule for this composite. These monthly returns are then geometrically linked to produce annual returns which are presented before custodial fees but after management fees and all trading expenses. Fees are negotiable and additional information regarding Chandler's fees is included in our Part 2A of Form ADV.
7. Dispersion is calculated using the asset weighted standard deviation of annual gross returns of those portfolios that were included in the composite for the entire year. For years when less than six portfolios were included in the composite for the full year, no dispersion measure is presented. The three-year annualized standard deviation measures the variability of the composite gross returns and the benchmark returns over the preceding 36-month period. Policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
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# GIPS® Composite Report: Short Term Bond



## Annual Rates of Return 2009 through 2019

Year	Returns			3 Year Annualized		Dispersion		Assets		
	Total	Total		Standard Deviation		Asset Wtd	Number of	Composite	% of Firm	Firm
End	Gross	Net	Index	Composite	Index	Std. Dev.	Portfolios	(MM)	Assets	(MM)
2009	2.80%	2.50%	0.91%	n/a	n/a	0.35%	29	1,554	31.29%	4,965
2010	3.97%	3.70%	3.46%	n/a	n/a	0.11%	33	1,906	33.12%	5,755
2011	2.90%	2.64%	3.19%	1.47%	1.65%	0.07%	32	1,866	31.48%	5,929
2012	1.80%	1.54%	0.98%	1.18%	1.27%	0.26%	38	2,133	33.17%	6,431
2013	0.04%	-0.21%	-0.16%	1.02%	1.10%	0.08%	39	2,168	30.26%	7,165
2014	1.42%	1.17%	1.24%	0.96%	0.99%	0.07%	40	2,325	26.14%	8,894
2015	1.15%	0.90%	0.96%	1.11%	1.18%	0.07%	44	3,403	28.97%	11,747
2016	1.30%	1.04%	1.08%	1.24%	1.39%	0.05%	49	4,131	32.07%	12,882
2017	1.08%	0.83%	0.67%	1.19%	1.34%	0.11%	48	3,783	27.62%	13,698
2018	1.53%	1.27%	1.55%	1.22%	1.40%	0.05%	48	3,485	21.06%	16,551
2019	4.55%	4.29%	4.19%	1.22%	1.39%	0.19%	55	5,199	26.59%	19,552

Chandler Asset Management claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards.

Chandler Asset Management has been independently verified by ACA Performance Services for the period of July 1, 1997 through March 31, 2020. The verification report is available upon request. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. Verification does not provide assurance on the accuracy of any specific performance report.

1. Chandler Asset Management is an independent investment adviser registered as such with the Securities and Exchange Commission under the Investment Adviser's Act of 1940. Registration with the SEC does not imply a certain level of skill or training. Since 1988, Chandler Asset Management has provided fixed income investment management services to the public sector, as well as to foundations, endowments, individuals and corporations. A complete list and description of all of the firm's composites is available upon request.
2. The Short Term Bond Composite is a composite of individually managed accounts with an average modified duration approximately equal to the modified duration of the ICE Bank of America Merrill Lynch 1-5 Year US Treasury & Agency Index and a maximum final stated maturity of individual securities of five years. The minimum account size required to be included in this composite is \$2 million. This composite was created in September 1995. The name of this composite was changed from 1-5 Year Government Fixed Income effective June 30, 2009.
3. The ICE BAML 1-5 Year US Treasury & Agency Index tracks the performance of US dollar denominated US Treasury and nonsubordinated US agency debt issued in the US domestic market. Qualifying securities must have an investment grade rating (based on an average of Moody's, S&P and Fitch). Qualifying securities must have at least one year remaining term to final maturity and less than five years remaining term to final maturity, at least 18 months to maturity at time of issuance, a fixed coupon schedule, and a minimum amount outstanding of \$1 billion for sovereigns and \$250 million for agencies. Indexes are referred to for comparative purposes only and are not intended to parallel the risk or investment style of the portfolios in the Composite. Indexes do not utilize leverage. Index calculations do not reflect fees, brokerage commissions or other expenses of investing. Investors may not make direct investments into any index. Index data contained herein (and all trademarks related thereto) are owned by the indicated index provider, and may not be redistributed. The information herein has not been approved by the index provider.
4. Valuations are computed and performance reported in U.S. Dollars.
5. Performance is calculated using a time-weighted total rate of return, which links performance monthly, and is reported gross of investment management fees and custodial fees, but after all trading expenses. Results reflect the reinvestment of income, dividends and other earnings, and include realized and unrealized gains and losses and interest accrued through the last day of each month. Results do not reflect the potential impact of taxes. Past performance is not indicative of future results. Fees charged by Chandler Asset Management will reduce performance.
6. Net-of-fees performance returns are calculated by reducing the monthly gross performance by one-twelfth (1/12) of the actual maximum applicable fee of 0.25%, which is reflective of our current fee schedule for this composite. These monthly returns are then geometrically linked to produce annual returns which are presented before custodial fees but after management fees and all trading expenses. Fees are negotiable and additional information regarding Chandler's fees is included in our Part 2A of Form ADV.
7. Dispersion is calculated using the asset weighted standard deviation of annual gross returns of those portfolios that were included in the composite for the entire year. For years when less than six portfolios were included in the composite for the full year, no dispersion measure is presented. The three-year annualized standard deviation measures the variability of the composite gross returns and the benchmark returns over the preceding 36-month period. Policies for valuing investments, calculating performance, and preparing GIPS reports are available upon request.
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## **Appendix E**

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### **Important Disclosures**



## **IMPORTANT DISCLOSURES**

### ***Florida PRIME***

The *Local Government Surplus Funds Trust Fund (Florida PRIME)* is a Stable NAV Local Government Investment Pool. Florida Prime is an open-pool investment fund operated by the State Board of Administration (SBA) of Florida. Florida Prime's investment policy guidelines were created to be like Rule 2a-7 with a weighted average maturity to reset managed to 60 days or less. The pool's guidelines allow for the purchase of only money-market assets of the highest quality such as: U.S. Treasury and U.S. agency obligations; corporate obligations (including commercial paper and asset-backed commercial paper); municipal securities; bank obligations (such as certificates of deposit, banker's acceptances, and time deposits); repurchase agreements; and money-market mutual funds.

### ***ICE BAML 0-3 Year Blended US Treasury Index***

The *ICE BAML Blended 0-3 Year US Treasury Index* is a static, internally maintained benchmark comprised of US dollar denominated sovereign debt publicly issued by the US government in its domestic market. Effective 1/1/2001, it consists of the following indices: (30%) ICE BAML US 3-Month Treasury Bill Index, (30%) ICE BAML US 6-Month Treasury Bill Index, (40%) ICE BAML 1-3 Year US Treasury Index. Qualifying securities will include 3 and 6-month Treasury Bills and US Treasury securities that must have at least one year remaining term to final maturity and less than three years remaining term to final maturity, a fixed coupon schedule, and a minimum amount outstanding of \$1 billion. Qualifying securities must have at least 18 months to final maturity at the time of issuance. \*Prior to 1/1/2001 it consisted of (100%) ICE BAML US 1-Year Treasury Bill Index, G003.

### ***ICE BAML 1-3 Year US Treasury Index***

The *ICE BAML 1-3 Year US Treasury Index* tracks the performance of US dollar-denominated sovereign debt publicly issued by the US government in its domestic market. Qualifying securities must have at least one year remaining term to final maturity and less than three years remaining term to final maturity, a fixed coupon schedule, and a minimum amount outstanding of \$1 billion. Qualifying securities must have at least 18 months to final maturity at the time of issuance.

### ***ICE BAML 1-5 Year US Treasury & Agency Index***

The *ICE BAML 1-5 Year US Treasury & Agency Index* tracks the performance of US dollar denominated US Treasury and nonsubordinated US agency debt issued in the US domestic market. Qualifying securities must have an investment grade rating (based on an average of Moody's, S&P and Fitch). Qualifying securities must have at least one year remaining term to final maturity and less than five years remaining term to final maturity, at least 18 months to maturity at time of issuance, a fixed coupon schedule, and a minimum amount outstanding of \$1 billion for sovereigns and \$250 million for agencies.

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This report is being provided for informational purposes only. No investment decision should be made based solely on the information provided herein. All investments involve risk, including loss of principal invested. The strategies referenced may not be suitable for all investors. The information contained herein is based on internal research derived from various sources and does not purport to be statements of all material facts relating to the strategies. While not guaranteed as to accuracy or completeness, some of the information has been obtained



from sources we believe to be reliable. Third-party source information is provided by independent sources deemed to be reliable but is not guaranteed. Opinions expressed herein are subject to change without notice. There can be no assurance that an account or specific investment product will be able to achieve its investment objective. No guarantee of investment performance is being provided and no inference to the contrary should be made.

Any forecasts, forward-looking statements and assumptions are inherently limited and should not be relied upon as an indicator of future results. Any opinions or views constitute judgments made by the author at the date of this presentation and may become outdated or superseded at any time without notice. Any statements concerning financial market trends are based on current market conditions, which will fluctuate.

Where listed, certain performance shown is hypothetical and does not represent actual trading in a client's account. HYPOTHETICAL OR SIMULATED PERFORMANCE RESULTS HAVE CERTAIN LIMITATIONS. UNLIKE AN ACTUAL PERFORMANCE RECORD, SIMULATED RESULTS DO NOT REPRESENT ACTUAL TRADING. NO REPRESENTATION IS BEING MADE THAT ANY ACCOUNT WILL OR IS LIKELY TO ACHIEVE PROFIT OR LOSSES SIMILAR TO THOSE SHOWN. THERE ARE FREQUENTLY SHARP DIFFERENCES BETWEEN HYPOTHETICAL PERFORMANCE RESULTS AND THE ACTUAL RESULTS SUBSEQUENTLY ACHIEVED BY ANY PARTICULAR TRADING PROGRAM. ONE OF THE LIMITATIONS OF HYPOTHETICAL PERFORMANCE RESULTS IS THAT THEY ARE GENERALLY PREPARED WITH THE BENEFIT OF HINDSIGHT. IN ADDITION, HYPOTHETICAL TRADING DOES NOT INVOLVE FINANCIAL RISK AND DOES NOT TAKE INTO ACCOUNT THAT MATERIAL AND MARKET FACTORS MAY HAVE IMPACTED THE ADVISER'S DECISION-MAKING IF THE ADVISER WERE ACTUALLY MANAGING CLIENT'S MONEY. NO HYPOTHETICAL TRADING RECORD CAN COMPLETELY ACCOUNT FOR THE IMPACT OF FINANCIAL RISK IN ACTUAL TRADING. FOR EXAMPLE, THE ABILITY TO WITHSTAND LOSSES OR ADHERE TO A PARTICULAR TRADING PROGRAM IN SPITE OF TRADING LOSSES ARE MATERIAL POINTS WHICH CAN ALSO ADVERSELY AFFECT ACTUAL TRADING RESULTS. THERE ARE NUMEROUS OTHER FACTORS RELATED TO THE MARKETS IN GENERAL OR TO THE IMPLEMENTATION OF ANY SPECIFIC TRADING PROGRAM WHICH CANNOT BE FULLY ACCOUNTED FOR IN THE PREPARATION OF HYPOTHETICAL PERFORMANCE RESULTS, ALL OF WHICH CAN ADVERSELY AFFECT ACTUAL TRADING RESULTS. It should not be assumed that investors who invest in Chandler Asset Management's Portfolios will be profitable or achieve the hypothetical performance results reflected or any corresponding index presented. Actual performance of and holdings and investment implementation in Chandler Asset Management's client accounts can materially differ from that of the hypothetical models presented herein and performance can be higher or lower than the results shown. Investors may have experienced investment results during the corresponding time periods that were materially different from those portrayed. Back-tested performance does not represent actual performance and should not be interpreted as an indication of such performance. The opinions referenced are as of the date of publication and are subject to change. Chandler Asset Management has discretion in the timing of trade execution and selection of securities traded and utilized in any client account, which can and will materially differ from the hypothetical simulated performance based upon a variety of factors, including the adviser's discretion to not follow any trading signal generated and to determine the timing and implementation of a trade (which can include securities other than those listed).

Index returns assume reinvestment of all distributions. Historical performance results for investment indexes generally do not reflect the deduction of transaction and/or custodial charges or the deduction of an investment management fee, the incurrence of which would have the effect of decreasing historical performance results. It is not possible to invest directly in an index.

Fixed income investments are subject to interest, credit, and market risk. Interest rate risk: the value of fixed income investments will decline as interest rates rise. Credit risk: the possibility that the borrower may not be able to repay interest and principal. Low rated bonds generally have to pay higher interest rates to attract investors willing to take on greater risk. Market risk: the bond market in general could decline due to economic conditions, especially during periods of rising interest rates.



## **Appendix F**

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### **ACORD Certificate of Liability**

ACORD™

## CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

07/24/2020

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an **ADDITIONAL INSURED**, the policy(ies) must have **ADDITIONAL INSURED** provisions or be endorsed. If **SUBROGATION IS WAIVED**, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer any rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> <b>Starkweather &amp; Shepley</b> <b>PO Box 549</b> <b>Providence, RI 02901-0549</b> <b>401 435-3600</b>	<b>CONTACT NAME:</b> <b>Connie Roussel</b> <b>PHONE (A/C, No, Ext):</b> <b>401 435-3600</b> <b>FAX (A/C, No):</b> <b>401 431-9657</b> <b>E-MAIL ADDRESS:</b> <b>croussel@starshep.com</b>														
<b>INSURED</b> <b>Chandler Asset Management Inc</b> <b>6225 Lusk Boulevard</b> <b>San Diego, CA 92121</b>	<table border="1"> <thead> <tr> <th>INSURER(S) AFFORDING COVERAGE</th> <th>NAIC #</th> </tr> </thead> <tbody> <tr> <td>INSURER A : Travelers Insurance Company</td> <td>25674</td> </tr> <tr> <td>INSURER B : Hartford Fire Insurance Company</td> <td>19682</td> </tr> <tr> <td>INSURER C : Endurance Risk Solutions Assurance</td> <td>43630</td> </tr> <tr> <td>INSURER D : Pacific Insurance Company, Limited</td> <td>10046</td> </tr> <tr> <td>INSURER E : Scottsdale Insurance</td> <td>41297</td> </tr> <tr> <td>INSURER F :</td> <td></td> </tr> </tbody> </table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A : Travelers Insurance Company	25674	INSURER B : Hartford Fire Insurance Company	19682	INSURER C : Endurance Risk Solutions Assurance	43630	INSURER D : Pacific Insurance Company, Limited	10046	INSURER E : Scottsdale Insurance	41297	INSURER F :	
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INSURER D : Pacific Insurance Company, Limited	10046														
INSURER E : Scottsdale Insurance	41297														
INSURER F :															

## COVERAGES

## CERTIFICATE NUMBER:

## REVISION NUMBER:

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR  GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			6802C07960542	09/01/2020	09/01/2021	EACH OCCURRENCE \$2,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$1,000,000 MED EXP (Any one person) \$5,000 PERSONAL & ADV INJURY \$2,000,000 GENERAL AGGREGATE \$4,000,000 PRODUCTS - COMP/OP AGG \$4,000,000 \$
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO OWNED AUTOS ONLY <input checked="" type="checkbox"/> HIRED AUTOS ONLY <input checked="" type="checkbox"/> Drive Oth Car <input type="checkbox"/> SCHEDULED AUTOS NON-OWNED AUTOS ONLY			BA2C081883SEL	09/01/2020	09/01/2021	COMBINED SINGLE LIMIT (Ea accident) \$1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$ \$
A	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> EXCESS LIAB <input type="checkbox"/> DED <input type="checkbox"/> RETENTION \$	<input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS-MADE		CUP2C08502242	09/01/2020	09/01/2021	EACH OCCURRENCE \$10,000,000 AGGREGATE \$10,000,000 \$
B	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE/OFFICER/MEMBER EXCLUDED? <input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below		N/A	02WECCR2756	09/01/2020	09/01/2021	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER E.L. EACH ACCIDENT \$1,000,000 E.L. DISEASE - EA EMPLOYEE \$1,000,000 E.L. DISEASE - POLICY LIMIT \$1,000,000
B	Prof Liability			08DC021984520	08/02/2020	08/02/2021	10,000,000
D	Cyber Liab			08MB0287990	08/02/2020	08/02/2021	4,000,000
B	Crime			08FA024546720	08/02/2020	08/02/2021	10,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

## \*\* Other Lines Information \*\*

E: Employment Practices Liability EKS3300455 Eff Date: 08/02/2020 Exp Date: 08/02/2021 Limit: \$1,000,000

C: Excess Professional Liability FIX30001867800 Eff Date: 08/02/2020 Exp Date: 08/02/2021 Limit: \$10,000,000

(See Attached Descriptions)

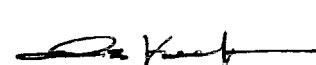
## CERTIFICATE HOLDER

## CANCELLATION

Chandler Asset Management, Inc  
 6225 Lusk Boulevard  
 San Diego, CA 92121

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE





## **Appendix G**

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### **Sample Client Monthly Statement, Quarterly Report and GASB 40 and 72 Reports**



# Sample Client - Account #000000

## MONTHLY ACCOUNT STATEMENT

JULY 1, 2018 THROUGH JULY 31, 2018

### Chandler Team:

For questions about your account, please call (800) 317-4747,  
or contact [operations@chandlerasset.com](mailto:operations@chandlerasset.com)

### Custodian:

Bank Name

Contact

Telephone Number

**CHANDLER ASSET MANAGEMENT**

[chandlerasset.com](http://chandlerasset.com)

*Information contained herein is confidential. We urge you to compare this statement to the one you receive from your qualified custodian. Please see Important Disclosures.*

*Please note: This sample client service report is being provided for illustrative purposes to demonstrate Chandler Asset Management's reporting capabilities. References to specific securities and their characteristics are examples of securities held in the portfolio and are not intended to be, and should not be interpreted as an offer, solicitation or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio. The information contained in this sample presentation was obtained from sources we believe to be reliable, but we do not guarantee its accuracy. This presentation contains the current opinions of the author, which are subject to change without notice. Any statements concerning financial market trends or future forecasts are based on current market conditions, which will fluctuate. Past performance is not indicative of future success.*

## Sample Client

Account #000000

## Portfolio Summary

As of Month-end Date



### PORTFOLIO CHARACTERISTICS

Average Modified Duration	1.65
Average Coupon	1.71%
Average Purchase YTM	1.76%
Average Market YTM	2.63%
Average S&P/Moody Rating	AA+/Aa1
Average Final Maturity	1.71 yrs
Average Life	1.71 yrs

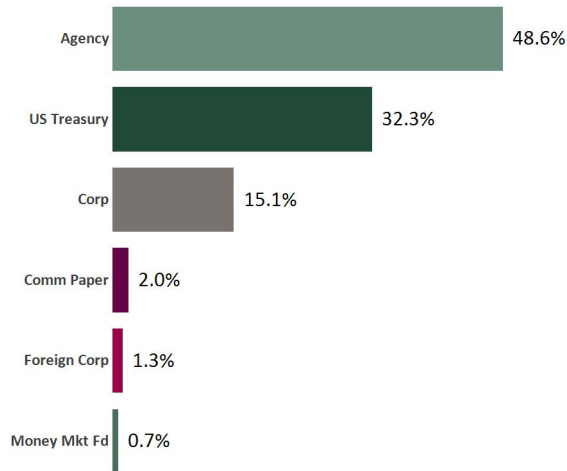
### ACCOUNT SUMMARY

	Beg. Values as of 6/30/18	End Values as of 7/31/18
Market Value	76,345,943	76,401,796
Accrued Interest	326,558	325,766
Total Market Value	<b>76,672,501</b>	<b>76,727,562</b>
Income Earned	108,722	114,931
Cont/WD		0
Par	77,522,170	77,662,679
Book Value	77,312,026	77,427,515
Cost Value	77,390,949	77,513,133

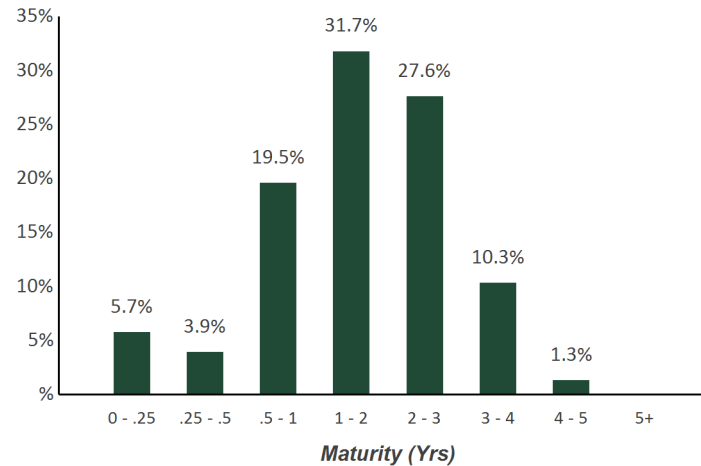
### TOP ISSUERS

United States Government	32.3%
U.S. Agency	16.8%
U.S. Agency	15.0%
U.S. Agency	12.3%
U.S. Agency	4.5%
Corporate Security	2.0%
Asset-Backed Security	1.7%
Corporate Security	1.4%
<b>Total</b>	<b>86.0%</b>

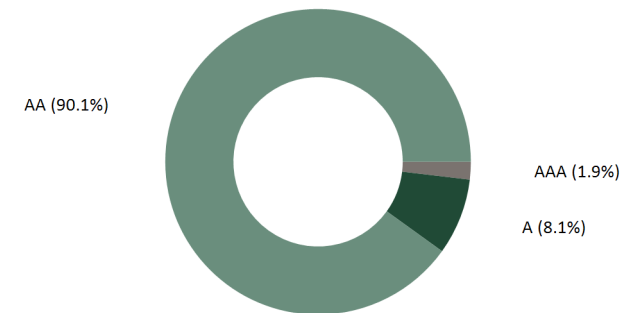
### SECTOR ALLOCATION



### MATURITY DISTRIBUTION



### CREDIT QUALITY (S&P)



### PERFORMANCE REVIEW

TOTAL RATE OF RETURN	1M	3M	YTD	1YR	Annualized				
					2YRS	3YRS	5YRS	10YRS	2/28/2015
Sample Client	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N/A	N/A	0.00%
Sample Index	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	N/A	N/A	0.00%

This report is intended as a representative illustration of our monthly reporting capabilities only and is not intended as a representation of our performance. Performance is presented gross of investment management fees. Investment advisory fees are described in the firm's Form ADV Part 2A Brochure and will reduce returns. References to specific securities and their characteristics are examples of securities held in the portfolio and are not intended to be, and should not be interpreted as an offer, solicitation or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio. Past performance is not indicative of future results.



# Statement of Compliance

As of Month-end Date



## Sample Client

Assets managed by Chandler Asset Management are in full compliance with state law and the Client's investment instructions.

Category	Standard	Comment
Treasury/Agency Issues	No Limit	Complies
Time Deposits/Certificates of Deposit	FDIC insured or fully collateralized	Complies
Negotiable CDs	"AA" or higher by two NRSROs; 30% maximum; 2% per issuer	Complies
Commercial Paper	"A-1" or higher short term rating by two NRSROs; and "A" or higher by two NRSROs, if long-term debt; 25% maximum; 2% per issuer; 270 days max maturity	Complies
Medium Term Notes	"A" rated or better by two NRSROs; 25% maximum; 12.5% maximum if rated "A" by two NRSROs; 2% per issuer if rated AA or higher; 1.5% per issuer if rated A; Issued by corporations organized and operating within the U.S. or by depository institutions licensed by the U.S. or any state and operating within the U.S.	Complies - 16.9% total; 8.9% "A" rated by two NRSROs
Money Market Mutual Funds	"AAA" rated by 2 NRSROs or SEC registered with AUM >\$500 million; 20% maximum; 10% per fund	Complies
Mortgage Pass Throughs	Federal Agency guaranteed; 20% maximum	Complies
Asset-Backed Securities	"AAA" rated or better by two NRSROs; "A" rated or higher for the issuer's debt by two NRSROs; 10% maximum; 2% per issuer; Prior consent with Director of Finance required	Complies
LAIF	Prohibited for outside manager	Complies
Prohibited	Inverse floaters; Ranges notes, Interest-only strips from mortgaged backed securities; Zero interest accrual securities; Reverse Repurchase Agreements; Futures/ Options prohibited without specific approval of the Finance Director	Complies
Max Per Issuer	2% of portfolio per issuer (except U.S. government, Agencies, and Money Market Funds)	Complies
Maximum Maturity	5 years	Complies

## Reconciliation Summary

As of Month-end Date



BOOK VALUE RECONCILIATION		
BEGINNING BOOK VALUE		\$77,312,026.12
<b><u>Acquisition</u></b>		
+ Security Purchases	\$1,972,010.00	
+ Money Market Fund Purchases	\$452,020.63	
+ Money Market Contributions	\$0.00	
+ Security Contributions	\$0.00	
+ Security Transfers	\$0.00	
<b>Total Acquisitions</b>		<b>\$2,424,030.63</b>
<b><u>Dispositions</u></b>		
- Security Sales	\$999,609.38	
- Money Market Fund Sales	\$1,001,512.22	
- MMF Withdrawals	\$0.00	
- Security Withdrawals	\$0.00	
- Security Transfers	\$0.00	
- Other Dispositions	\$0.00	
- Maturities	\$310,000.00	
- Calls	\$0.00	
- Principal Paydowns	\$0.00	
<b>Total Dispositions</b>		<b>\$2,311,121.60</b>
<b><u>Amortization/Accretion</u></b>		
+/- Net Accretion	\$2,814.81	
		\$2,814.81
<b><u>Gain/Loss on Dispositions</u></b>		
+/- Realized Gain/Loss	(\$234.79)	
		(\$234.79)
<b>ENDING BOOK VALUE</b>		<b>\$77,427,515.17</b>

CASH TRANSACTION SUMMARY		
BEGINNING BALANCE		\$1,097,170.35
<b><u>Acquisition</u></b>		
Contributions	\$0.00	
Security Sale Proceeds	\$999,609.38	
Accrued Interest Received	\$6,236.41	
Interest Received	\$106,675.00	
Dividend Received	\$2,664.28	
Principal on Maturities	\$310,000.00	
Interest on Maturities	\$0.00	
Calls/Redemption (Principal)	\$0.00	
Interest from Calls/Redemption	\$0.00	
Principal Paydown	\$0.00	
<b>Total Acquisitions</b>	<b>\$1,425,185.07</b>	
<b><u>Dispositions</u></b>		
Withdrawals	\$0.00	
Security Purchase	\$1,972,010.00	
Accrued Interest Paid	\$2,666.66	
<b>Total Dispositions</b>	<b>\$1,974,676.66</b>	
<b>ENDING BOOK VALUE</b>		<b>\$547,678.76</b>

## Sample Client

Account #000000

## Holdings Report

As of Month-end Date



CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>AGENCY</b>									
Sample CUSIP	Sample Issuer 2% Due 9/14/2018	1,500,000.00	02/07/2014 1.50%	1,533,345.00 1,500,874.89	99.99 2.06%	1,499,865.00 11,416.68	1.97% (1,009.89)	Aaa / AA+ AAA	0.12 0.12
Sample CUSIP	Sample Issuer 1.625% Due 11/27/2018	2,000,000.00	Various 1.57%	2,005,390.00 2,000,348.26	99.83 2.14%	1,996,686.00 5,777.77	2.61% (3,662.26)	Aaa / AA+ AAA	0.33 0.32
Sample CUSIP	Sample Issuer 1.125% Due 12/14/2018	1,000,000.00	12/15/2015 1.38%	992,620.00 999,089.31	99.62 2.15%	996,233.00 1,468.75	1.30% (2,856.31)	Aaa / AA+ AAA	0.37 0.37
Sample CUSIP	Sample Issuer 1.5% Due 3/8/2019	1,500,000.00	02/12/2016 1.03%	1,521,015.00 1,504,123.91	99.54 2.27%	1,493,130.00 8,937.50	1.96% (10,993.91)	Aaa / AA+ AAA	0.60 0.59
Sample CUSIP	Sample Issuer 1.125% Due 4/15/2019	2,000,000.00	Various 1.01%	2,007,055.00 2,001,654.04	99.14 2.36%	1,982,808.00 6,625.00	2.59% (18,846.04)	Aaa / AA+ AAA	0.71 0.69
Sample CUSIP	Sample Issuer 1.75% Due 5/30/2019	1,350,000.00	08/18/2014 1.64%	1,356,966.00 1,351,205.58	99.46 2.40%	1,342,755.90 4,003.13	1.76% (8,449.68)	Aaa / AA+ AAA	0.83 0.82
Sample CUSIP	Sample Issuer 1.125% Due 6/21/2019	1,500,000.00	06/28/2016 0.83%	1,513,035.00 1,503,885.32	98.86 2.43%	1,482,847.50 1,875.00	1.94% (21,037.82)	Aaa / AA+ AAA	0.89 0.88
Sample CUSIP	Sample Issuer 1.25% Due 8/1/2019	1,500,000.00	06/28/2016 0.86%	1,517,565.00 1,505,683.71	98.81 2.46%	1,482,193.50 9,375.00	1.94% (23,490.21)	Aaa / AA+ AAA	1.00 0.98
Sample CUSIP	Sample Issuer 1.75% Due 9/12/2019	1,525,000.00	Various 1.86%	1,517,171.50 1,523,246.80	99.15 2.53%	1,512,069.53 10,304.34	1.98% (11,177.27)	Aaa / AA+ AAA	1.12 1.09
Sample CUSIP	Sample Issuer 1.375% Due 9/13/2019	1,500,000.00	08/24/2016 1.02%	1,515,960.00 1,505,845.31	98.75 2.52%	1,481,248.50 7,906.25	1.94% (24,596.81)	Aaa / AA+ NR	1.12 1.09
Sample CUSIP	Sample Issuer 1.25% Due 10/2/2019	2,000,000.00	Various 1.04%	2,012,700.00 2,004,918.61	98.52 2.54%	1,970,390.00 8,263.88	2.58% (34,528.61)	Aaa / AA+ AAA	1.17 1.15
Sample CUSIP	Sample Issuer 1.5% Due 1/17/2020	1,520,000.00	01/12/2017 1.54%	1,518,358.40 1,519,199.44	98.45 2.58%	1,496,509.92 886.67	1.95% (22,689.52)	Aaa / AA+ AAA	1.47 1.43
Sample CUSIP	Sample Issuer 1.5% Due 2/28/2020	2,000,000.00	Various 1.56%	1,996,672.00 1,998,209.40	98.22 2.66%	1,964,314.00 12,750.00	2.58% (33,895.40)	Aaa / AA+ AAA	1.58 1.53
Sample CUSIP	Sample Issuer 1.875% Due 3/13/2020	750,000.00	05/03/2017 1.57%	756,382.50 753,606.97	98.72 2.69%	740,382.00 5,390.63	0.97% (13,224.97)	Aaa / AA+ NR	1.62 1.57
Sample CUSIP	Sample Issuer 1.55% Due 5/8/2020	2,000,000.00	05/23/2017 1.58%	1,998,340.00 1,999,007.07	98.08 2.67%	1,961,588.00 7,147.22	2.57% (37,419.07)	Aaa / AA+ AAA	1.77 1.72
Sample CUSIP	Sample Issuer 1.75% Due 6/12/2020	1,500,000.00	06/15/2017 1.59%	1,506,855.00 1,504,274.96	98.26 2.71%	1,473,907.50 3,572.92	1.93% (30,367.46)	Aaa / AA+ NR	1.87 1.81

## Sample Client

Account #000000

## Holdings Report

As of Month-end Date



CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>AGENCY</b>									
Sample CUSIP	Sample Issuer 1.375% Due 9/28/2020	1,500,000.00	09/14/2017 1.59%	1,490,535.00 1,493,266.11	97.16 2.74%	1,457,452.50 7,046.88	1.91% (35,813.61)	Aaa / AA+ NR	2.16 2.10
Sample CUSIP	Sample Issuer 1.68% Due 10/13/2020	1,500,000.00	10/18/2017 1.78%	1,495,845.00 1,496,935.21	97.69 2.77%	1,465,302.00 7,560.00	1.92% (31,633.21)	Aaa / AA+ AAA	2.21 2.13
Sample CUSIP	Sample Issuer 1.875% Due 11/17/2020	1,250,000.00	11/27/2017 1.95%	1,247,450.00 1,248,028.16	98.05 2.76%	1,225,591.25 4,817.71	1.60% (22,436.91)	Aaa / AA+ AAA	2.30 2.22
Sample CUSIP	Sample Issuer 2.375% Due 2/16/2021	1,000,000.00	04/20/2018 2.66%	992,270.00 993,020.49	98.96 2.80%	989,615.00 10,885.42	1.30% (3,405.49)	Aaa / AA+ AAA	2.55 2.42
Sample CUSIP	Sample Issuer 2.375% Due 3/12/2021	2,000,000.00	03/26/2018 2.54%	1,990,840.00 1,991,916.15	98.45 2.99%	1,969,042.00 18,340.28	2.59% (22,874.15)	Aaa / AA+ AAA	2.62 2.49
Sample CUSIP	Sample Issuer 2.5% Due 4/13/2021	1,000,000.00	06/15/2018 2.72%	993,920.00 994,179.73	99.14 2.83%	991,369.00 7,500.00	1.30% (2,810.73)	Aaa / AA+ AAA	2.70 2.57
Sample CUSIP	Sample Issuer 1.875% Due 6/11/2021	1,250,000.00	08/30/2017 1.67%	1,259,425.00 1,257,137.05	97.32 2.86%	1,216,468.75 3,255.21	1.59% (40,668.30)	Aaa / AA+ AAA	2.87 2.75
Sample CUSIP	Sample Issuer 2.75% Due 6/22/2021	1,000,000.00	07/10/2018 2.74%	1,000,290.00 1,000,284.35	99.77 2.83%	997,684.00 2,750.00	1.30% (2,600.35)	Aaa / AA+ AAA	2.90 2.75
Sample CUSIP	Sample Issuer 1.125% Due 8/12/2021	1,000,000.00	10/04/2016 1.37%	988,440.00 992,778.26	95.11 2.82%	951,132.00 5,281.25	1.25% (41,646.26)	Aaa / AA+ AAA	3.04 2.93
Sample CUSIP	Sample Issuer 2% Due 1/5/2022	1,000,000.00	07/30/2018 2.87%	971,720.00 971,742.55	97.09 2.90%	970,860.00 1,444.44	1.27% (882.55)	Aaa / AA+ AAA	3.44 3.28
<b>Total Agency</b>		<b>37,645,000.00</b>	<b>1.61%</b>	<b>37,700,165.40</b> <b>37,614,461.64</b>	<b>2.58%</b>	<b>37,111,444.85</b> <b>174,581.93</b>	<b>48.60%</b> <b>(503,016.79)</b>	<b>Aaa / AA+</b> <b>AAA</b>	<b>1.56</b> <b>1.51</b>
<b>COMMERCIAL PAPER</b>									
Sample CUSIP	Sample Issuer 2.34% Due 10/15/2018	1,530,000.00	06/14/2018 2.39%	1,517,867.10 1,517,867.10	99.21 2.39%	1,517,867.10 4,674.15	1.98% 0.00	P-1 / A-1 NR	0.21 0.21
<b>Total Commercial Paper</b>		<b>1,530,000.00</b>	<b>2.39%</b>	<b>1,517,867.10</b> <b>1,517,867.10</b>	<b>2.39%</b>	<b>1,517,867.10</b> <b>4,674.15</b>	<b>1.98%</b> <b>0.00</b>	<b>P-1 / A-1</b> <b>NR</b>	<b>0.21</b> <b>0.21</b>

## Sample Client

Account #000000

## Holdings Report

As of Month-end Date



CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>FOREIGN CORPORATE</b>									
Sample CUSIP	Sample Issuer	1,000,000.00	01/29/2018	985,980.00	96.91	969,083.00	1.27%	A2 / A	3.44
	2.65% Due 1/5/2022		3.03%	987,758.15	3.62%	1,913.89	(18,675.15)	AA-	3.23
<b>Total Foreign Corporate</b>		<b>1,000,000.00</b>	<b>3.03%</b>	<b>985,980.00</b> <b>987,758.15</b>	<b>3.62%</b>	<b>969,083.00</b> <b>1,913.89</b>	<b>1.27%</b> <b>(18,675.15)</b>	<b>A2 / A</b> <b>AA-</b>	<b>3.44</b> <b>3.23</b>
<b>MONEY MARKET FUND FI</b>									
Sample CUSIP	Sample Issuer MMKT Fund #657	547,678.76	Various	547,678.76	1.00	547,678.76	0.71%	Aaa / AAA	0.00
			1.55%	547,678.76	1.55%	0.00	0.00	NR	0.00
<b>Total Money Market Fund FI</b>		<b>547,678.76</b>	<b>1.55%</b>	<b>547,678.76</b> <b>547,678.76</b>	<b>1.55%</b>	<b>547,678.76</b> <b>0.00</b>	<b>0.71%</b> <b>0.00</b>	<b>Aaa / AAA</b> <b>NR</b>	<b>0.00</b> <b>0.00</b>
<b>CORPORATE</b>									
Sample CUSIP	Sample Issuer	790,000.00	02/05/2014	795,387.80	100.00	790,000.00	1.04%	A1 / A	0.00
	Callable Note Cont 7/2/2018		2.10%	790,000.00	2.10%	8,295.00	0.00	AA-	0.00
	2.1% Due 8/1/2018								
Sample CUSIP	Sample Issuer	750,000.00	11/19/2014	751,755.00	99.80	748,504.50	0.98%	A1 / AA-	0.58
	2.125% Due 3/1/2019		2.07%	750,238.80	2.47%	6,640.62	(1,734.30)	NR	0.57
Sample CUSIP	Sample Issuer	900,000.00	05/28/2014	903,825.00	99.65	896,823.00	1.18%	A2 / A	0.59
	1.95% Due 3/4/2019		1.86%	900,472.90	2.55%	7,166.25	(3,649.90)	A	0.58
Sample CUSIP	Sample Issuer	900,000.00	06/10/2014	896,049.00	99.68	897,083.10	1.18%	A2 / AA-	0.62
	1.95% Due 3/15/2019		2.05%	899,485.64	2.48%	6,630.00	(2,402.54)	A	0.61
Sample CUSIP	Sample Issuer	570,000.00	03/08/2016	569,566.80	99.52	567,240.06	0.74%	Aa2 / AA	0.62
	1.7% Due 3/15/2019		1.73%	569,910.59	2.49%	3,660.67	(2,670.53)	A+	0.61
Sample CUSIP	Sample Issuer	890,000.00	08/01/2016	889,083.30	98.58	877,381.58	1.15%	Aaa / AAA	1.02
	1.1% Due 8/8/2019		1.14%	889,688.57	2.52%	4,704.64	(12,306.99)	AA+	1.00
Sample CUSIP	Sample Issuer	1,000,000.00	05/26/2017	1,008,120.00	98.25	982,527.00	1.29%	A3 / A	2.26
	Cont 10/3/2020, 2.3% Due 11/3/2020		2.05%	1,005,280.33	3.10%	5,622.22	(22,753.33)	A	2.17

## Sample Client

Account #000000

## Holdings Report

As of Month-end Date



CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>CORPORATE</b>									
Sample CUSIP	Sample Issuer 12/23/2020 2.5% Due 1/22/2021	1,325,000.00	02/21/2018 2.90%	1,310,239.50 1,312,445.25	98.19 3.27%	1,301,028.10 828.13	1.70% (11,417.15)	A2 / A A+	2.48 2.37
Sample CUSIP	Sample Issuer 4/15/2021 2.1% Due 5/16/2021	1,000,000.00	03/09/2018 2.84%	977,610.00 980,331.54	97.76 2.94%	977,595.00 4,375.00	1.28% (2,736.54)	Aa2 / AA- NR	2.79 2.67
Sample CUSIP	Sample Issuer Cont 4/21/2021 3.25% Due 5/21/2021	350,000.00	05/17/2018 3.25%	349,989.50 349,990.18	100.15 3.19%	350,539.00 2,180.21	0.46% 548.82	A2 / A A	2.81 2.57
Sample CUSIP	Sample Issuer Note 3.125% Due 6/23/2021	815,000.00	06/20/2018 3.13%	814,959.25 814,960.56	100.23 3.04%	816,892.43 2,405.38	1.07% 1,931.87	Aa2 / AA AA	2.90 2.74
Sample CUSIP	Sample Issuer 12/23/2021 2.625% Due 1/24/2022	900,000.00	04/26/2017 2.44%	907,353.00 905,363.36	97.70 3.33%	879,306.30 459.38	1.15% (26,057.06)	A1 / A+ AA-	3.49 3.29
Sample CUSIP	Sample Issuer 3% Due 5/15/2022	500,000.00	05/23/2017 2.30%	516,390.00 512,488.91	99.75 3.07%	498,744.00 3,166.67	0.65% (13,744.91)	Aa2 / AA A+	3.79 3.53
Sample CUSIP	Sample Issuer 12/13/2022 2.4% Due 1/13/2023	1,000,000.00	05/09/2018 3.25%	963,260.00 965,023.86	96.64 3.22%	966,389.00 1,200.00	1.26% 1,365.14	Aa1 / AA+ NR	4.46 4.17
<b>Total US Corporate</b>		<b>11,690,000.00</b>	<b>2.37%</b>	<b>11,653,588.15</b> <b>11,645,680.49</b>	<b>2.85%</b>	<b>11,550,053.07</b> <b>57,334.17</b>	<b>15.13%</b> <b>(95,627.42)</b>	<b>A1 / AA- A+</b>	<b>2.04</b> <b>1.93</b>
<b>US TREASURY</b>									
Sample CUSIP	Sample Issuer 1.5% Due 1/31/2019	1,850,000.00	Various 1.41%	1,855,715.18 1,850,844.32	99.64 2.23%	1,843,351.10 75.40	2.40% (7,493.22)	Aaa / AA+ AAA	0.50 0.49
Sample CUSIP	Sample Issuer 1.5% Due 2/28/2019	1,750,000.00	03/18/2014 1.55%	1,746,041.02 1,749,537.72	99.56 2.26%	1,742,343.75 10,985.05	2.29% (7,193.97)	Aaa / AA+ AAA	0.58 0.57
Sample CUSIP	Sample Issuer 1.625% Due 4/30/2019	1,200,000.00	Various 1.49%	1,207,472.77 1,201,131.81	99.46 2.36%	1,193,484.00 4,927.98	1.56% (7,647.81)	Aaa / AA+ AAA	0.75 0.74
Sample CUSIP	Sample Issuer 1.125% Due 5/31/2019	750,000.00	03/18/2016 1.04%	751,965.40 750,510.73	98.96 2.39%	742,206.75 1,429.30	0.97% (8,303.98)	Aaa / AA+ AAA	0.83 0.82
Sample CUSIP	Sample Issuer 1.625% Due 8/31/2019	2,000,000.00	Various 1.27%	2,022,287.95 2,007,463.77	99.07 2.50%	1,981,484.00 13,600.55	2.60% (25,979.77)	Aaa / AA+ AAA	1.08 1.06
Sample CUSIP	Sample Issuer 1.5% Due 11/30/2019	1,200,000.00	12/11/2014 1.60%	1,194,332.15 1,198,481.49	98.62 2.56%	1,183,406.40 3,049.18	1.55% (15,075.09)	Aaa / AA+ AAA	1.33 1.31

## Sample Client

Account #000000

## Holdings Report

As of Month-end Date



CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>US TREASURY</b>									
Sample CUSIP	Sample Issuer 1.25% Due 1/31/2020	1,250,000.00	11/14/2016 1.32%	1,247,318.64 1,248,746.26	98.04 2.59%	1,225,440.00 42.46	1.60% (23,306.26)	Aaa / AA+ AAA	1.50 1.47
Sample CUSIP	Sample Issuer 1.375% Due 2/29/2020	2,000,000.00	Various 1.22%	2,011,686.39 2,004,889.55	98.09 2.61%	1,961,796.00 11,508.16	2.57% (43,093.55)	Aaa / AA+ AAA	1.58 1.54
Sample CUSIP	Sample Issuer 1.375% Due 4/30/2020	1,500,000.00	Various 1.34%	1,500,883.94 1,500,793.04	97.84 2.65%	1,467,538.50 5,212.29	1.92% (33,254.54)	Aaa / AA+ AAA	1.75 1.71
Sample CUSIP	Sample Issuer 1.5% Due 5/31/2020	1,500,000.00	Various 1.63%	1,492,309.71 1,496,600.63	97.94 2.66%	1,469,062.50 3,811.47	1.92% (27,538.13)	Aaa / AA+ AAA	1.84 1.79
Sample CUSIP	Sample Issuer 1.375% Due 9/30/2020	750,000.00	05/03/2017 1.59%	744,758.37 746,669.78	97.25 2.69%	729,345.75 3,465.68	0.96% (17,324.03)	Aaa / AA+ AAA	2.17 2.10
Sample CUSIP	Sample Issuer 1.625% Due 11/30/2020	1,000,000.00	07/25/2017 1.62%	1,000,081.48 1,000,056.76	97.52 2.73%	975,234.00 2,752.73	1.27% (24,822.76)	Aaa / AA+ AAA	2.34 2.26
Sample CUSIP	Sample Issuer 1.375% Due 1/31/2021	1,250,000.00	11/14/2016 1.58%	1,239,750.28 1,243,908.81	96.72 2.74%	1,209,033.75 46.71	1.58% (34,875.06)	Aaa / AA+ AAA	2.51 2.43
Sample CUSIP	Sample Issuer 1.25% Due 3/31/2021	1,000,000.00	01/30/2018 2.31%	967,773.44 972,851.56	96.17 2.75%	961,680.00 4,200.82	1.26% (11,171.56)	Aaa / AA+ AAA	2.67 2.58
Sample CUSIP	Sample Issuer 1.375% Due 4/30/2021	1,000,000.00	12/27/2017 2.08%	977,382.81 981,390.45	96.37 2.76%	963,672.00 3,493.85	1.26% (17,718.45)	Aaa / AA+ AAA	2.75 2.66
Sample CUSIP	Sample Issuer 2% Due 5/31/2021	1,500,000.00	01/24/2017 1.83%	1,510,844.87 1,507,065.91	97.95 2.76%	1,469,179.50 5,081.97	1.92% (37,886.41)	Aaa / AA+ AAA	2.84 2.72
Sample CUSIP	Sample Issuer 1.125% Due 7/31/2021	1,000,000.00	12/27/2017 2.11%	966,171.88 971,745.39	95.28 2.78%	952,773.00 30.57	1.24% (18,972.39)	Aaa / AA+ AAA	3.00 2.92
Sample CUSIP	Sample Issuer 1.125% Due 9/30/2021	1,500,000.00	Various 1.83%	1,460,042.42 1,467,636.23	95.01 2.78%	1,425,117.00 5,671.11	1.86% (42,519.23)	Aaa / AA+ AAA	3.17 3.06
Sample CUSIP	Sample Issuer 1.875% Due 3/31/2022	1,250,000.00	04/20/2018 2.71%	1,211,035.16 1,213,744.82	96.76 2.81%	1,209,521.25 7,876.54	1.59% (4,223.57)	Aaa / AA+ AAA	3.67 3.49
<b>Total US Treasury</b>		<b>25,250,000.00</b>	<b>1.62%</b>	<b>25,107,853.86</b> <b>25,114,069.03</b>	<b>2.59%</b>	<b>24,705,669.25</b> <b>87,261.82</b>	<b>32.31%</b> <b>(408,399.78)</b>	<b>Aaa / AA+</b> <b>AAA</b>	<b>1.84</b> <b>1.78</b>
<b>TOTAL PORTFOLIO</b>		<b>77,662,678.76</b>	<b>1.76%</b>	<b>77,513,133.27</b> <b>77,427,515.17</b>	<b>2.63%</b>	<b>76,401,796.03</b> <b>325,765.96</b>	<b>100.00%</b> <b>(1,025,719.14)</b>	<b>Aa1 / AA+</b> <b>AAA</b>	<b>1.71</b> <b>1.65</b>
<b>TOTAL MARKET VALUE PLUS ACCRUED</b>						<b>76,727,561.99</b>			

## Sample Client

Account #000000

## Transaction Ledger

As of Month-end Date



Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
<b>ACQUISITIONS</b>										
Purchase	07/03/2018	Sample CUSIP	2,664.28	Sample Issuer	1.000	1.51%	2,664.28	0.00	2,664.28	0.00
Purchase	07/05/2018	Sample CUSIP	13,250.00	Sample Issuer	1.000	1.51%	13,250.00	0.00	13,250.00	0.00
Purchase	07/11/2018	Sample CUSIP	1,000,000.00	Sample Issuer	100.029	2.74%	1,000,290.00	1,222.22	1,001,512.22	0.00
Purchase	07/13/2018	Sample CUSIP	16,000.00	Sample Issuer	1.000	1.51%	16,000.00	0.00	16,000.00	0.00
Purchase	07/17/2018	Sample CUSIP	11,400.00	Sample Issuer	1.000	1.51%	11,400.00	0.00	11,400.00	0.00
Purchase	07/20/2018	Sample CUSIP	1,743.75	Sample Issuer	1.000	1.51%	1,743.75	0.00	1,743.75	0.00
Purchase	07/20/2018	Sample CUSIP	310,000.00	Sample Issuer	1.000	1.51%	310,000.00	0.00	310,000.00	0.00
Purchase	07/22/2018	Sample CUSIP	16,562.50	Sample Issuer	1.000	1.51%	16,562.50	0.00	16,562.50	0.00
Purchase	07/24/2018	Sample CUSIP	11,812.50	Sample Issuer	1.000	1.51%	11,812.50	0.00	11,812.50	0.00
Purchase	07/31/2018	Sample CUSIP	1,000,000.00	Sample Issuer	97.172	2.87%	971,720.00	1,444.44	973,164.44	0.00
Purchase	07/31/2018	Sample CUSIP	32,681.35	Sample Issuer	1.000	1.55%	32,681.35	0.00	32,681.35	0.00
Purchase	07/31/2018	Sample CUSIP	35,906.25	Sample Issuer	1.000	1.55%	35,906.25	0.00	35,906.25	0.00
<b>Subtotal</b>			<b>2,452,020.63</b>				<b>2,424,030.63</b>	<b>2,666.66</b>	<b>2,426,697.29</b>	<b>0.00</b>
<b>TOTAL ACQUISITIONS</b>			<b>2,452,020.63</b>				<b>2,424,030.63</b>	<b>2,666.66</b>	<b>2,426,697.29</b>	<b>0.00</b>
<b>DISPOSITIONS</b>										
Sale	07/11/2018	Sample CUSIP	1,001,512.22	Sample Issuer	1.000	1.51%	1,001,512.22	0.00	1,001,512.22	0.00



## Sample Client

Account #000000

## Transaction Ledger

As of Month-end Date



Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
<b>DISPOSITIONS</b>										
Sale	07/31/2018	Sample CUSIP	1,000,000.00	Sample Issuer 1.5% Due 8/31/2018	99.961	1.95%	999,609.38	6,236.41	1,005,845.79	-234.79
<b>Subtotal</b>			<b>2,001,512.22</b>				<b>2,001,121.60</b>	<b>6,236.41</b>	<b>2,007,358.01</b>	<b>-234.79</b>
Maturity	07/20/2018	Sample CUSIP	310,000.00	Sample Issuer 1.125% Due 7/20/2018	100.000		310,000.00	0.00	310,000.00	0.00
<b>Subtotal</b>			<b>310,000.00</b>				<b>310,000.00</b>	<b>0.00</b>	<b>310,000.00</b>	<b>0.00</b>
<b>TOTAL DISPOSITIONS</b>			<b>2,311,512.22</b>				<b>2,311,121.60</b>	<b>6,236.41</b>	<b>2,317,358.01</b>	<b>-234.79</b>

<b>OTHER TRANSACTIONS</b>										
Interest	07/05/2018	Sample CUSIP	1,000,000.00	Sample Issuer 2.65% Due 1/5/2022	0.000		13,250.00	0.00	13,250.00	0.00
Interest	07/13/2018	Sample CUSIP	1,000,000.00	Sample Issuer 2.4% Due 1/13/2023	0.000		16,000.00	0.00	16,000.00	0.00
Interest	07/17/2018	Sample CUSIP	1,520,000.00	Sample Issuer 1.5% Due 1/17/2020	0.000		11,400.00	0.00	11,400.00	0.00
Interest	07/20/2018	Sample CUSIP	310,000.00	Sample Issuer 1.125% Due 7/20/2018	0.000		1,743.75	0.00	1,743.75	0.00
Interest	07/22/2018	Sample CUSIP	1,325,000.00	Sample Issuer 2.5% Due 1/22/2021	0.000		16,562.50	0.00	16,562.50	0.00
Interest	07/24/2018	Sample CUSIP	900,000.00	Sample Issuer 2.625% Due 1/24/2022	0.000		11,812.50	0.00	11,812.50	0.00
Interest	07/31/2018	Sample CUSIP	1,850,000.00	Sample Issuer 1.5% Due 1/31/2019	0.000		13,875.00	0.00	13,875.00	0.00
Interest	07/31/2018	Sample CUSIP	1,250,000.00	Sample Issuer 1.25% Due 1/31/2020	0.000		7,812.50	0.00	7,812.50	0.00
Interest	07/31/2018	Sample CUSIP	1,250,000.00	Sample Issuer 1.375% Due 1/31/2021	0.000		8,593.75	0.00	8,593.75	0.00



Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
OTHER TRANSACTIONS										
Interest	07/31/2018	Sample CUSIP	1,000,000.00	Sample Issuer 1.125% Due 7/31/2021	0.000		5,625.00	0.00	5,625.00	0.00
Subtotal			11,405,000.00				106,675.00	0.00	106,675.00	0.00
Dividend	07/03/2018	Sample CUSIP	2,194,340.70	Sample Issuer Fund #657	0.000		2,664.28	0.00	2,664.28	0.00
Subtotal			2,194,340.70				2,664.28	0.00	2,664.28	0.00
TOTAL OTHER TRANSACTIONS			13,599,340.70				109,339.28	0.00	109,339.28	0.00

## Sample Client

Account #000000

## Income Earned

As of Month-end Date



CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
<b>FIXED INCOME</b>						
Sample CUSIP	Sample Issuer Callable Note Cont 10/3/2020 2.3% Due 11/03/2020	05/26/2017 05/31/2017 1,000,000.00	1,005,486.49 0.00 0.00 1,005,280.33	3,705.56 0.00 5,622.22 1,916.66	0.00 206.16 (206.16) 1,710.50	1,710.50
Sample CUSIP	Sample Issuer Callable Note Cont 12/13/2022 2.4% Due 01/13/2023	05/09/2018 05/11/2018 1,000,000.00	964,357.04 0.00 0.00 965,023.86	15,200.00 16,000.00 1,200.00 2,000.00	666.82 0.00 666.82 2,666.82	2,666.82
Sample CUSIP	Sample Issuer Callable Note Cont 7/2/2018 2.1% Due 08/01/2018	02/05/2014 02/10/2014 790,000.00	790,003.37 0.00 0.00 790,000.00	6,912.50 0.00 8,295.00 1,382.50	0.00 3.37 (3.37) 1,379.13	1,379.13
Sample CUSIP	Sample Issuer Note 3% Due 05/15/2022	05/23/2017 05/26/2017 500,000.00	512,768.85 0.00 0.00 512,488.91	1,916.67 0.00 3,166.67 1,250.00	0.00 279.94 (279.94) 970.06	970.06
Sample CUSIP	Sample Issuer Note 1.7% Due 03/15/2019	03/08/2016 03/15/2016 570,000.00	569,898.33 0.00 0.00 569,910.59	2,853.17 0.00 3,660.67 807.50	12.26 0.00 12.26 819.76	819.76
Sample CUSIP	Sample Issuer Callable Note Cont 4/15/2021 2.1% Due 05/16/2021	03/09/2018 03/13/2018 1,000,000.00	979,733.19 0.00 0.00 980,331.54	2,625.00 0.00 4,375.00 1,750.00	598.35 0.00 598.35 2,348.35	2,348.35
Sample CUSIP	Sample Issuer Note 2.125% Due 03/01/2019	11/19/2014 11/24/2014 750,000.00	750,273.72 0.00 0.00 750,238.80	5,312.50 0.00 6,640.62 1,328.12	0.00 34.92 (34.92) 1,293.20	1,293.20
Sample CUSIP	Sample Issuer Note 1.95% Due 03/04/2019	05/28/2014 05/30/2014 900,000.00	900,541.08 0.00 0.00 900,472.90	5,703.75 0.00 7,166.25 1,462.50	0.00 68.18 (68.18) 1,394.32	1,394.32
Sample CUSIP	Sample Issuer Note 2.375% Due 03/12/2021	03/26/2018 03/27/2018 2,000,000.00	1,991,653.47 0.00 0.00 1,991,916.15	14,381.94 0.00 18,340.28 3,958.34	262.68 0.00 262.68 4,221.02	4,221.02

## Sample Client

Account #000000

## Income Earned

As of Month-end Date



CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
Sample CUSIP	Sample Issuer Note 1.125% Due 06/21/2019	06/28/2016 06/29/2016 1,500,000.00	1,504,257.06 0.00 0.00 1,503,885.32	468.75 0.00 1,875.00 1,406.25	0.00 371.74 (371.74) 1,034.51	1,034.51
Sample CUSIP	Sample Issuer Note 1.375% Due 09/28/2020	09/14/2017 09/15/2017 1,500,000.00	1,493,001.53 0.00 0.00 1,493,266.11	5,328.13 0.00 7,046.88 1,718.75	264.58 0.00 264.58 1,983.33	1,983.33
Sample CUSIP	Sample Issuer Note 2% Due 09/14/2018	02/07/2014 02/10/2014 1,500,000.00	1,501,491.27 0.00 0.00 1,500,874.89	8,916.66 0.00 11,416.68 2,500.02	0.00 616.38 (616.38) 1,883.64	1,883.64
Sample CUSIP	Sample Issuer Note 1.5% Due 03/08/2019	02/12/2016 02/16/2016 1,500,000.00	1,504,707.66 0.00 0.00 1,504,123.91	7,062.50 0.00 8,937.50 1,875.00	0.00 583.75 (583.75) 1,291.25	1,291.25
Sample CUSIP	Sample Issuer Note 1.875% Due 03/13/2020	05/03/2017 05/04/2017 750,000.00	753,796.49 0.00 0.00 753,606.97	4,218.75 0.00 5,390.63 1,171.88	0.00 189.52 (189.52) 982.36	982.36
Sample CUSIP	Sample Issuer Note 1.875% Due 06/11/2021	08/30/2017 08/31/2017 1,250,000.00	1,257,348.77 0.00 0.00 1,257,137.05	1,302.08 0.00 3,255.21 1,953.13	0.00 211.72 (211.72) 1,741.41	1,741.41
Sample CUSIP	Sample Issuer Note 1.375% Due 09/13/2019	08/24/2016 08/25/2016 1,500,000.00	1,506,289.44 0.00 0.00 1,505,845.31	6,187.50 0.00 7,906.25 1,718.75	0.00 444.13 (444.13) 1,274.62	1,274.62
Sample CUSIP	Sample Issuer Note 1.75% Due 06/12/2020	06/15/2017 06/16/2017 1,500,000.00	1,504,469.56 0.00 0.00 1,504,274.96	1,385.42 0.00 3,572.92 2,187.50	0.00 194.60 (194.60) 1,992.90	1,992.90
Sample CUSIP	Sample Issuer Note 1.68% Due 10/13/2020	10/18/2017 10/19/2017 1,500,000.00	1,496,817.04 0.00 0.00 1,496,935.21	5,460.00 0.00 7,560.00 2,100.00	118.17 0.00 118.17 2,218.17	2,218.17

## Sample Client

Account #000000

## Income Earned

As of Month-end Date



CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income
Sample CUSIP	Sample Issuer Note Due 08/31/2018	09/13/2013 09/16/2013 0.00	999,693.37 0.00 999,844.17 0.00	5,013.59 6,236.41 0.00 1,222.82	150.80 0.00 150.80 1,373.62	1,373.62
Sample CUSIP	Sample Issuer Note 1.125% Due 07/31/2021	12/27/2017 12/28/2017 1,000,000.00	970,945.49 0.00 0.00 971,745.39	4,692.68 5,625.00 30.57 962.89	799.90 0.00 799.90 1,762.79	1,762.79
Sample CUSIP	Sample Issuer Note 1.125% Due 05/31/2019	03/18/2016 03/21/2016 750,000.00	750,562.99 0.00 0.00 750,510.73	714.65 0.00 1,429.30 714.65	0.00 52.26 (52.26) 662.39	662.39
Sample CUSIP	Sample Issuer Note 1.125% Due 09/30/2021	Various Various 1,500,000.00	1,466,768.34 0.00 0.00 1,467,636.23	4,241.80 0.00 5,671.11 1,429.31	867.89 0.00 867.89 2,297.20	2,297.20
Sample CUSIP	Sample Issuer Note 1.875% Due 03/31/2022	04/20/2018 04/23/2018 1,250,000.00	1,212,904.82 0.00 0.00 1,213,744.82	5,891.39 0.00 7,876.54 1,985.15	840.00 0.00 840.00 2,825.15	2,825.15
Sample CUSIP	Sample Issuer Note 2% Due 05/31/2021	01/24/2017 01/25/2017 1,500,000.00	1,507,277.75 0.00 0.00 1,507,065.91	2,540.98 0.00 5,081.97 2,540.99	0.00 211.84 (211.84) 2,329.15	2,329.15
Sample CUSIP	Sample Issuer Note 1.5% Due 05/31/2020	Various Various 1,500,000.00	1,496,443.12 0.00 0.00 1,496,600.63	1,905.74 0.00 3,811.47 1,905.73	157.51 0.00 157.51 2,063.24	2,063.24
Sample CUSIP	Sample Issuer Note 3.125% Due 06/23/2021	06/20/2018 06/27/2018 815,000.00	814,959.40 0.00 0.00 814,960.56	282.99 0.00 2,405.38 2,122.39	1.16 0.00 1.16 2,123.55	2,123.55
			74,696,988.67 1,972,010.00 1,309,844.17	324,967.26 110,244.75 321,091.81	9,005.04 6,190.23 2,814.81	
<b>Total Fixed Income</b>			<b>75,585,000.00</b>	<b>106,369.30</b>	<b>109,184.11</b>	<b>109,184.11</b>

## Sample Client

Account #000000

## Income Earned

As of Month-end Date



CUSIP	Security Description	Trade Date Settle Date Units	Book Value: Begin Book Value: Acq Book Value: Disp Book Value: End	Prior Accrued Inc. Received Ending Accrued Total Interest	Accr. Of Discount Amort. Of Premium Net Accret/Amort Income Earned	Total Income	
CASH &							
EQUIVALENT	Sample Issuer	Various	1,097,170.35	0.00	0.00	2,664.28	
Sample CUSIP	Government MMKT Fund #657	Various	452,020.63	2,664.28	0.00		
			547,678.76	1,001,512.22	0.00	0.00	
				547,678.76	2,664.28	2,664.28	
Sample CUSIP	Sample Issuer	06/14/2018	1,517,867.10	1,591.20	0.00	3,082.95	
	Discount CP	06/15/2018	0.00	0.00	0.00		
	2.34% Due 10/15/2018		1,530,000.00	0.00	4,674.15	0.00	
				1,517,867.10	3,082.95	3,082.95	
			2,615,037.45	1,591.20	0.00		
			452,020.63	2,664.28	0.00		
			1,001,512.22	4,674.15	0.00		
Total Cash & Equivalent		2,077,678.76	2,065,545.86	5,747.23	5,747.23	5,747.23	
			77,312,026.12	326,558.46	9,005.04		
			2,424,030.63	112,909.03	6,190.23		
			2,311,356.39	325,765.96	2,814.81		
TOTAL PORTFOLIO		77,662,678.76	77,427,515.17	112,116.53	114,931.34	114,931.34	

## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
08/01/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.25% Due 8/1/2019	0.00	9,375.00	9,375.00
08/01/2018	Maturity	Sample CUSIP	790,000.00	Sample Issuer Callable Note Cont 7/2/2018	790,000.00	8,295.00	798,295.00
08/08/2018	Interest	Sample CUSIP	890,000.00	Sample Issuer 1.1% Due 8/8/2019	0.00	4,895.00	4,895.00
08/12/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.125% Due 8/12/2021	0.00	5,625.00	5,625.00
08/16/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.375% Due 2/16/2021	0.00	11,875.00	11,875.00
08/28/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.5% Due 2/28/2020	0.00	15,000.00	15,000.00
08/31/2018	Interest	Sample CUSIP	1,750,000.00	Sample Issuer 1.5% Due 2/28/2019	0.00	13,125.00	13,125.00
08/31/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.625% Due 8/31/2019	0.00	16,250.00	16,250.00
08/31/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.375% Due 2/29/2020	0.00	13,750.00	13,750.00
<b>AUG 2018</b>					<b>790,000.00</b>	<b>98,190.00</b>	<b>888,190.00</b>
09/01/2018	Interest	Sample CUSIP	750,000.00	Sample Issuer 2.125% Due 3/1/2019	0.00	7,968.75	7,968.75
09/04/2018	Interest	Sample CUSIP	900,000.00	Sample Issuer 1.95% Due 3/4/2019	0.00	8,775.00	8,775.00
09/08/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.5% Due 3/8/2019	0.00	11,250.00	11,250.00
09/12/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 2.375% Due 3/12/2021	0.00	23,750.00	23,750.00
09/12/2018	Interest	Sample CUSIP	1,525,000.00	Sample Issuer 1.75% Due 9/12/2019	0.00	13,343.75	13,343.75
09/13/2018	Interest	Sample CUSIP	750,000.00	Sample Issuer 1.875% Due 3/13/2020	0.00	7,031.25	7,031.25
09/13/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.375% Due 9/13/2019	0.00	10,312.50	10,312.50

## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
09/14/2018	Maturity	Sample CUSIP	1,500,000.00	Sample Issuer 2% Due 9/14/2018	1,500,000.00	15,000.00	1,515,000.00
09/15/2018	Interest	Sample CUSIP	900,000.00	Sample Issuer 1.95% Due 3/15/2019	0.00	8,775.00	8,775.00
09/15/2018	Interest	Sample CUSIP	570,000.00	Sample Issuer 1.7% Due 3/15/2019	0.00	4,845.00	4,845.00
09/28/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.375% Due 9/28/2020	0.00	10,312.50	10,312.50
09/30/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.25% Due 3/31/2021	0.00	6,250.00	6,250.00
09/30/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.125% Due 9/30/2021	0.00	8,437.50	8,437.50
09/30/2018	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.875% Due 3/31/2022	0.00	11,718.75	11,718.75
09/30/2018	Interest	Sample CUSIP	750,000.00	Sample Issuer 1.375% Due 9/30/2020	0.00	5,156.25	5,156.25
<b>SEP 2018</b>					<b>1,500,000.00</b>	<b>152,926.25</b>	<b>1,652,926.25</b>
10/02/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.25% Due 10/2/2019	0.00	12,500.00	12,500.00
10/13/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.5% Due 4/13/2021	0.00	12,500.00	12,500.00
10/13/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.68% Due 10/13/2020	0.00	12,600.00	12,600.00
10/15/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.125% Due 4/15/2019	0.00	11,250.00	11,250.00
10/15/2018	Maturity	Sample CUSIP	1,530,000.00	Sample Issuer 2.34% Due 10/15/2018	1,517,867.10	12,132.90	1,530,000.00
10/30/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.375% Due 4/30/2021	0.00	6,875.00	6,875.00
10/31/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.375% Due 4/30/2020	0.00	10,312.50	10,312.50
10/31/2018	Interest	Sample CUSIP	1,200,000.00	Sample Issuer 1.625% Due 4/30/2019	0.00	9,750.00	9,750.00
<b>OCT 2018</b>					<b>1,517,867.10</b>	<b>87,920.40</b>	<b>1,605,787.50</b>



## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
11/03/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 10/3/2020 2.3% Due 11/3/2020	0.00	11,500.00	11,500.00
11/08/2018	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.55% Due 5/8/2020	0.00	15,500.00	15,500.00
11/15/2018	Interest	Sample CUSIP	500,000.00	Sample Issuer 3% Due 5/15/2022	0.00	7,500.00	7,500.00
11/16/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 4/15/2021 2.1% Due 5/16/2021	0.00	10,500.00	10,500.00
11/17/2018	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.875% Due 11/17/2020	0.00	11,718.75	11,718.75
11/21/2018	Interest	Sample CUSIP	350,000.00	Sample Issuer 4/21/2021 3.25% Due 5/21/2021	0.00	5,655.90	5,655.90
11/27/2018	Maturity	Sample CUSIP	2,000,000.00	Sample Issuer 1.625% Due 11/27/2018	2,000,000.00	16,250.00	2,016,250.00
11/30/2018	Interest	Sample CUSIP	750,000.00	Sample Issuer 1.125% Due 5/31/2019	0.00	4,218.75	4,218.75
11/30/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 2% Due 5/31/2021	0.00	15,000.00	15,000.00
11/30/2018	Interest	Sample CUSIP	1,350,000.00	Sample Issuer 1.75% Due 5/30/2019	0.00	11,812.50	11,812.50
11/30/2018	Interest	Sample CUSIP	1,200,000.00	Sample Issuer 1.5% Due 11/30/2019	0.00	9,000.00	9,000.00
11/30/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.625% Due 11/30/2020	0.00	8,125.00	8,125.00
11/30/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.5% Due 5/31/2020	0.00	11,250.00	11,250.00
<b>NOV 2018</b>					<b>2,000,000.00</b>	<b>138,030.90</b>	<b>2,138,030.90</b>
12/11/2018	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.875% Due 6/11/2021	0.00	11,718.75	11,718.75
12/12/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.75% Due 6/12/2020	0.00	13,125.00	13,125.00
12/14/2018	Maturity	Sample CUSIP	1,000,000.00	Sample Issuer 1.125% Due 12/14/2018	1,000,000.00	5,625.00	1,005,625.00

## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
12/21/2018	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.125% Due 6/21/2019	0.00	8,437.50	8,437.50
12/22/2018	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.75% Due 6/22/2021	0.00	13,520.83	13,520.83
12/23/2018	Interest	Sample CUSIP	815,000.00	Sample Issuer 3.125% Due 6/23/2021	0.00	12,451.39	12,451.39
<b>DEC 2018</b>					<b>1,000,000.00</b>	<b>64,878.47</b>	<b>1,064,878.47</b>
01/05/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2% Due 1/5/2022	0.00	10,000.00	10,000.00
01/05/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.65% Due 1/5/2022	0.00	13,250.00	13,250.00
01/13/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer Cont 12/13/2022 2.4% Due 1/13/2023	0.00	12,000.00	12,000.00
01/17/2019	Interest	Sample CUSIP	1,520,000.00	Sample Issuer 1.5% Due 1/17/2020	0.00	11,400.00	11,400.00
01/22/2019	Interest	Sample CUSIP	1,325,000.00	Sample Issuer Cont 12/23/2020 2.5% Due 1/22/2021	0.00	16,562.50	16,562.50
01/24/2019	Interest	Sample CUSIP	900,000.00	Sample Issuer 12/23/2021 2.625% Due 1/24/2022	0.00	11,812.50	11,812.50
01/31/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.375% Due 1/31/2021	0.00	8,593.75	8,593.75
01/31/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.125% Due 7/31/2021	0.00	5,625.00	5,625.00
01/31/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.25% Due 1/31/2020	0.00	7,812.50	7,812.50
01/31/2019	Maturity	Sample CUSIP	1,850,000.00	Sample Issuer 1.5% Due 1/31/2019	1,850,000.00	13,875.00	1,863,875.00
<b>JAN 2019</b>					<b>1,850,000.00</b>	<b>110,931.25</b>	<b>1,960,931.25</b>
02/01/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.25% Due 8/1/2019	0.00	9,375.00	9,375.00
02/08/2019	Interest	Sample CUSIP	890,000.00	Sample Issuer 1.1% Due 8/8/2019	0.00	4,895.00	4,895.00
02/12/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.125% Due 8/12/2021	0.00	5,625.00	5,625.00

## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
02/16/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.375% Due 2/16/2021	0.00	11,875.00	11,875.00
02/28/2019	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.625% Due 8/31/2019	0.00	16,250.00	16,250.00
02/28/2019	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.375% Due 2/29/2020	0.00	13,750.00	13,750.00
02/28/2019	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.5% Due 2/28/2020	0.00	15,000.00	15,000.00
02/28/2019	Maturity	Sample CUSIP	1,750,000.00	Sample Issuer 1.5% Due 2/28/2019	1,750,000.00	13,125.00	1,763,125.00
<b>FEB 2019</b>					<b>1,750,000.00</b>	<b>89,895.00</b>	<b>1,839,895.00</b>
03/01/2019	Maturity	Sample CUSIP	750,000.00	Sample Issuer 2.125% Due 3/1/2019	750,000.00	7,968.75	757,968.75
03/04/2019	Maturity	Sample CUSIP	900,000.00	Sample Issuer 1.95% Due 3/4/2019	900,000.00	8,775.00	908,775.00
03/08/2019	Maturity	Sample CUSIP	1,500,000.00	Sample Issuer 1.5% Due 3/8/2019	1,500,000.00	11,250.00	1,511,250.00
03/12/2019	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 2.375% Due 3/12/2021	0.00	23,750.00	23,750.00
03/12/2019	Interest	Sample CUSIP	1,525,000.00	Sample Issuer 1.75% Due 9/12/2019	0.00	13,343.75	13,343.75
03/13/2019	Interest	Sample CUSIP	750,000.00	Sample Issuer 1.875% Due 3/13/2020	0.00	7,031.25	7,031.25
03/13/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.375% Due 9/13/2019	0.00	10,312.50	10,312.50
03/15/2019	Maturity	Sample CUSIP	570,000.00	Sample Issuer 1.7% Due 3/15/2019	570,000.00	4,845.00	574,845.00
03/15/2019	Maturity	Sample CUSIP	900,000.00	Sample Issuer 1.95% Due 3/15/2019	900,000.00	8,775.00	908,775.00
03/28/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.375% Due 9/28/2020	0.00	10,312.50	10,312.50
03/31/2019	Interest	Sample CUSIP	750,000.00	Sample Issuer 1.375% Due 9/30/2020	0.00	5,156.25	5,156.25

## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
03/31/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.125% Due 9/30/2021	0.00	8,437.50	8,437.50
03/31/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.25% Due 3/31/2021	0.00	6,250.00	6,250.00
03/31/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.875% Due 3/31/2022	0.00	11,718.75	11,718.75
<b>MAR 2019</b>					<b>4,620,000.00</b>	<b>137,926.25</b>	<b>4,757,926.25</b>
04/02/2019	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.25% Due 10/2/2019	0.00	12,500.00	12,500.00
04/13/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.5% Due 4/13/2021	0.00	12,500.00	12,500.00
04/13/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.68% Due 10/13/2020	0.00	12,600.00	12,600.00
04/15/2019	Maturity	Sample CUSIP	2,000,000.00	Sample Issuer 1.125% Due 4/15/2019	2,000,000.00	11,250.00	2,011,250.00
04/30/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.375% Due 4/30/2020	0.00	10,312.50	10,312.50
04/30/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.375% Due 4/30/2021	0.00	6,875.00	6,875.00
04/30/2019	Maturity	Sample CUSIP	1,200,000.00	Sample Issuer 1.625% Due 4/30/2019	1,200,000.00	9,750.00	1,209,750.00
<b>APR 2019</b>					<b>3,200,000.00</b>	<b>75,787.50</b>	<b>3,275,787.50</b>
05/03/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 10/3/2020 2.3% Due 11/3/2020	0.00	11,500.00	11,500.00
05/08/2019	Interest	Sample CUSIP	2,000,000.00	Sample Issuer 1.55% Due 5/8/2020	0.00	15,500.00	15,500.00
05/15/2019	Interest	Sample CUSIP	500,000.00	Sample Issuer 3% Due 5/15/2022	0.00	7,500.00	7,500.00
05/16/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 4/15/2021 2.1% Due 5/16/2021	0.00	10,500.00	10,500.00
05/17/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.875% Due 11/17/2020	0.00	11,718.75	11,718.75

## Sample Client

Account #000000

## Cash Flow Report

As of Month-end Date



Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
05/21/2019	Interest	Sample CUSIP	350,000.00	Sample Issuer Cont 4/21/2021 3.25% Due 5/21/2021	0.00	5,687.50	5,687.50
05/30/2019	Maturity	Sample CUSIP	1,350,000.00	Sample Issuer 1.75% Due 5/30/2019	1,350,000.00	11,812.50	1,361,812.50
05/31/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.625% Due 11/30/2020	0.00	8,125.00	8,125.00
05/31/2019	Interest	Sample CUSIP	1,200,000.00	Sample Issuer 1.5% Due 11/30/2019	0.00	9,000.00	9,000.00
05/31/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 2% Due 5/31/2021	0.00	15,000.00	15,000.00
05/31/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.5% Due 5/31/2020	0.00	11,250.00	11,250.00
05/31/2019	Maturity	Sample CUSIP	750,000.00	Sample Issuer 1.125% Due 5/31/2019	750,000.00	4,218.75	754,218.75
<b>MAY 2019</b>					<b>2,100,000.00</b>	<b>121,812.50</b>	<b>2,221,812.50</b>
06/11/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.875% Due 6/11/2021	0.00	11,718.75	11,718.75
06/12/2019	Interest	Sample CUSIP	1,500,000.00	Sample Issuer 1.75% Due 6/12/2020	0.00	13,125.00	13,125.00
06/21/2019	Maturity	Sample CUSIP	1,500,000.00	Sample Issuer 1.125% Due 6/21/2019	1,500,000.00	8,437.50	1,508,437.50
06/22/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.75% Due 6/22/2021	0.00	13,750.00	13,750.00
06/23/2019	Interest	Sample CUSIP	815,000.00	Sample Issuer 3.125% Due 6/23/2021	0.00	12,734.38	12,734.38
<b>JUN 2019</b>					<b>1,500,000.00</b>	<b>59,765.63</b>	<b>1,559,765.63</b>
07/05/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2% Due 1/5/2022	0.00	10,000.00	10,000.00
07/05/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 2.65% Due 1/5/2022	0.00	13,250.00	13,250.00
07/13/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 12/13/2022 2.4% Due 1/13/2023	0.00	12,000.00	12,000.00
07/17/2019	Interest	Sample CUSIP	1,520,000.00	Sample Issuer 1.5% Due 1/17/2020	0.00	11,400.00	11,400.00

**Sample Client**

Account #000000

**Cash Flow Report***As of Month-end Date*

Payment Date	Transaction Type	CUSIP	Quantity	Security Description	Principal Amount	Income	Total Amount
07/22/2019	Interest	Sample CUSIP	1,325,000.00	Sample Issuer 12/23/2020 2.5% Due 1/22/2021	0.00	16,562.50	16,562.50
07/24/2019	Interest	Sample CUSIP	900,000.00	Sample Issuer 12/23/2021 2.625% Due 1/24/2022	0.00	11,812.50	11,812.50
07/31/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.375% Due 1/31/2021	0.00	8,593.75	8,593.75
07/31/2019	Interest	Sample CUSIP	1,000,000.00	Sample Issuer 1.125% Due 7/31/2021	0.00	5,625.00	5,625.00
07/31/2019	Interest	Sample CUSIP	1,250,000.00	Sample Issuer 1.25% Due 1/31/2020	0.00	7,812.50	7,812.50
<b>JUL 2019</b>					<b>0.00</b>	<b>97,056.25</b>	<b>97,056.25</b>
<b>TOTAL</b>					<b>21,827,867.10</b>	<b>1,235,120.40</b>	<b>23,062,987.50</b>



Chandler Asset Management, Inc. ("Chandler") is an SEC registered investment adviser. For additional information about our firm, please see our current disclosures (Form ADV). To obtain a copy of our current disclosures, you may contact your client service representative by calling the number on the front of this statement or you may visit our website at [www.chandlerasset.com](http://www.chandlerasset.com).

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**Valuation:** Prices are provided by IDC, an independent pricing source. In the event IDC does not provide a price or if the price provided is not reflective of fair market value, Chandler will obtain pricing from an alternative approved third party pricing source in accordance with our written valuation policy and procedures. Our valuation procedures are also disclosed in Item 5 of our Form ADV Part 2A.

**Performance:** Performance results are presented gross-of-advisory fees and represent the client's Total Return. The deduction of advisory fees lowers performance results. These results include the reinvestment of dividends and other earnings. Past performance may not be indicative of future results. Therefore, clients should not assume that future performance of any specific investment or investment strategy will be profitable or equal to past performance levels. All investment strategies have the potential for profit or loss. Economic factors, market conditions or changes in investment strategies, contributions or withdrawals may materially alter the performance and results of your portfolio.

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**Ratings:** Ratings information have been provided by Moody's, S&P and Fitch through data feeds we believe to be reliable as of the date of this statement, however we cannot guarantee its accuracy.

# Sample Client Quarterly Report

*Period Ending September 30, 2018*

*Please note: This sample client service report is being provided for illustrative purposes to demonstrate Chandler Asset Management's reporting capabilities. References to specific securities and their characteristics are examples of securities held in the portfolio and are not intended to be, and should not be interpreted as an offer, solicitation or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio. The information contained in this sample presentation was obtained from sources we believe to be reliable as of the date of publication, but we do not guarantee its accuracy. This presentation contains the current opinions of the author, which are subject to change without notice. Any statements concerning financial market trends or future forecasts are based on current market conditions, which will fluctuate. Past performance is not indicative of future success. Fixed income investments are subject to interest, credit and market risk. Interest rate risk: the value of fixed income investments will decline as interest rates rise. Credit risk: the possibility that the borrower may not be able to repay interest and principal. Low rated bonds generally have to pay higher interest rates to attract investors willing to take on greater risk. Market risk: the bond market in general could decline due to economic conditions, especially during periods of rising interest rates.*

CHANDLER ASSET MANAGEMENT, INC. | 800.317.4747 | [www.chandlerasset.com](http://www.chandlerasset.com)





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<b>SECTION 2</b>	<b>Account Profile</b>
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<b>SECTION 5</b>	<b>Disclosures</b>

*\*Please see the disclosures on front page of this presentation.*



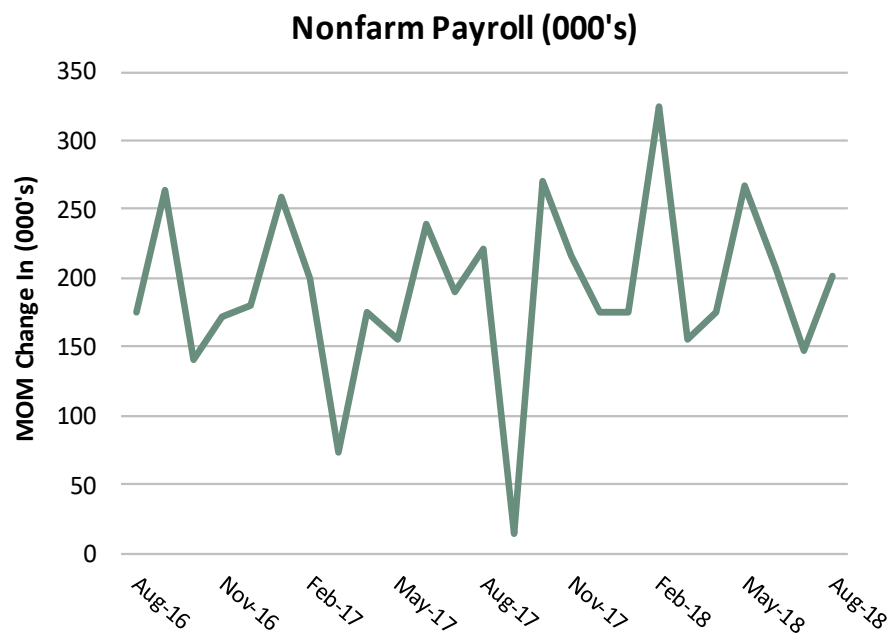


## Section 1 | Economic Update

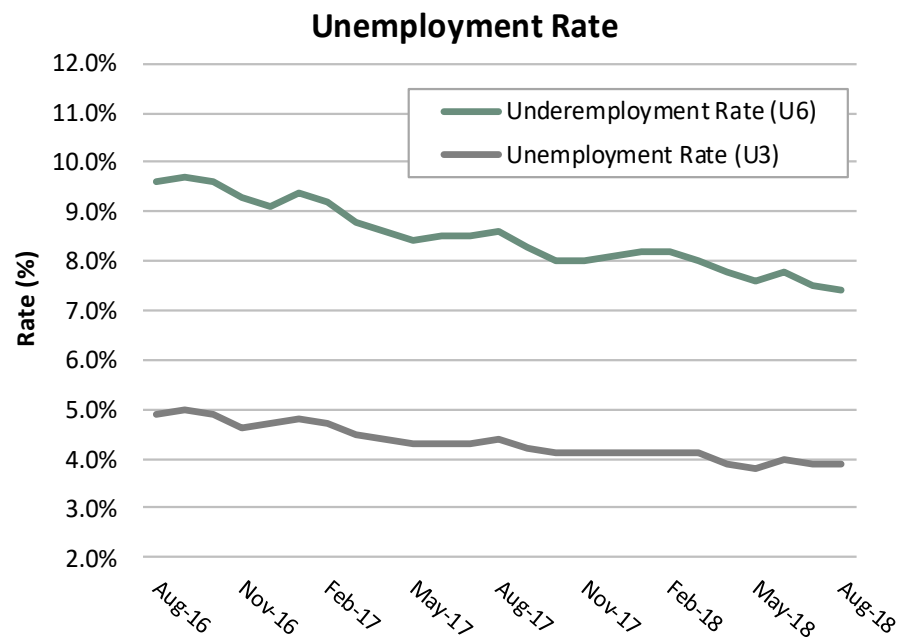
## Economic Update

- As expected, the Federal Open Market Committee (FOMC) voted to raise the fed funds target rate by 25 basis points to a range of 2.00%-2.25% at the September 26th meeting. The vote was unanimous, including a vote from the new Board of Governors Vice Chair, Richard Clarida. The Fed raised its median forecast for GDP growth in 2018 and 2019 and left its forecasts for unemployment and inflation relatively unchanged. The Fed also kept its fed funds rate forecasts unchanged with the exception of the longer-run target which increased slightly to 3.0%. The Fed's forecast points to one more fed funds rate hike this year and three more hikes next year. Once again, in its policy statement, the FOMC noted that economic activity has been rising at a "strong rate" and policymakers expect that further gradual increases in the fed funds rate will be appropriate. The FOMC continues to believe risks to the economic outlook are roughly balanced. Market participants believe there is a very high probability that there will be another rate hike in December.
- Economic data remains favorable but predictive economic indicators suggest that economic growth is unlikely to accelerate. Although the labor market is strong and consumer confidence is high, we do not believe the economy is close to overheating. The Core PCE Index suggests that inflation is in line with the Fed's 2.0% target. Market participants are forecasting annualized GDP growth of about 3.0% in the third quarter, 2.8% in the fourth quarter, and 2.5% next year.
- Treasury yields increased in September. At month-end, the 2-year Treasury yield was up 19 basis points to 2.82%, while the 10-year Treasury yield was up 20 basis points to 3.06%. The spread between 2- and 10-year Treasury yields remained narrow at just 24 basis points at month-end. Over the past 20 years, the average spread between 2- and 10-year Treasuries has been about 140 basis points. We foresee an upward bias to rates across the Treasury yield curve but believe that the yield curve will remain quite flat over the intermediate-term.

# Employment



Source: US Department of Labor



Source: US Department of Labor

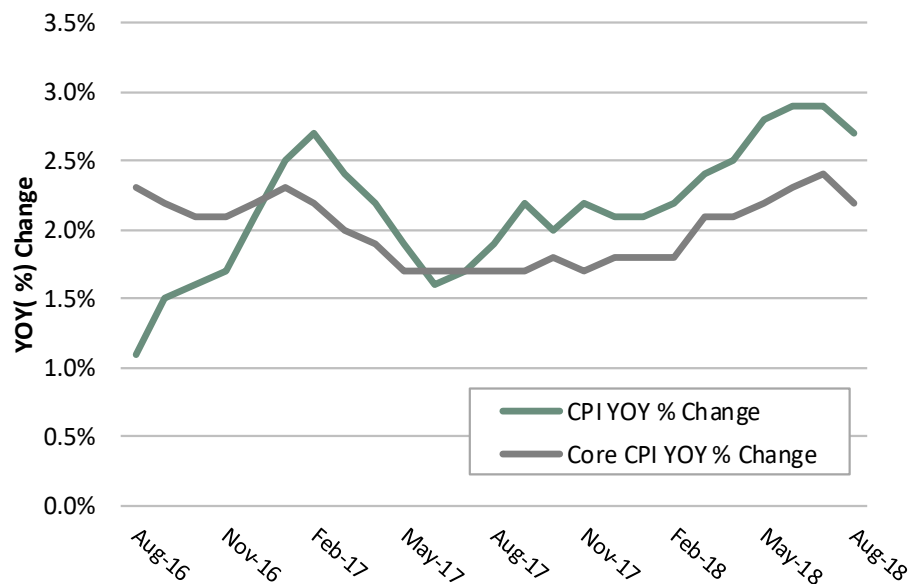
U.S. payrolls rose by 201,000 in August, above the consensus forecast of 190,000. June and July payrolls were revised down by a total of 50,000. On a trailing 3-month and 6-month basis payrolls increased by an average of 185,000 and 192,000 per month, respectively, more than enough to absorb new entrants into the labor market. The unemployment rate was unchanged from the prior month at 3.9%. The labor participation rate declined to 62.7% in August from 62.9% in July. A broader measure of unemployment called the U-6, which includes those who are marginally attached to the labor force and employed part time for economic reasons, declined to 7.4% in August from 7.5% in July. Wages rose 0.4% in August on a month-over-month basis, slightly higher than expectations. Wages were up 2.9% on a year-over-year basis in August, versus up 2.7% year-over-year in July. The average workweek was unchanged at 34.5 hours.

*\*Please see the disclosures on front page of this presentation.*



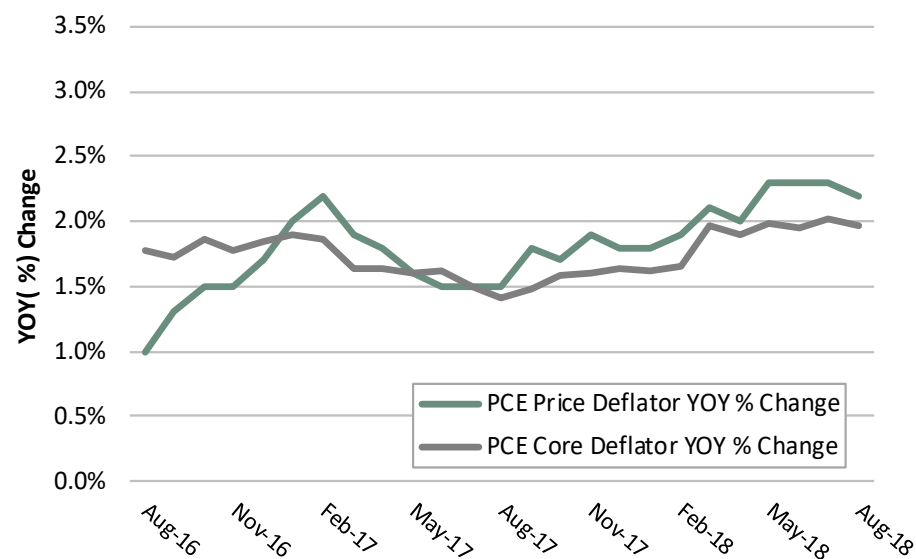
# Inflation

## Consumer Price Index (CPI)



Source: US Department of Labor

## Personal Consumption Expenditures (PCE)



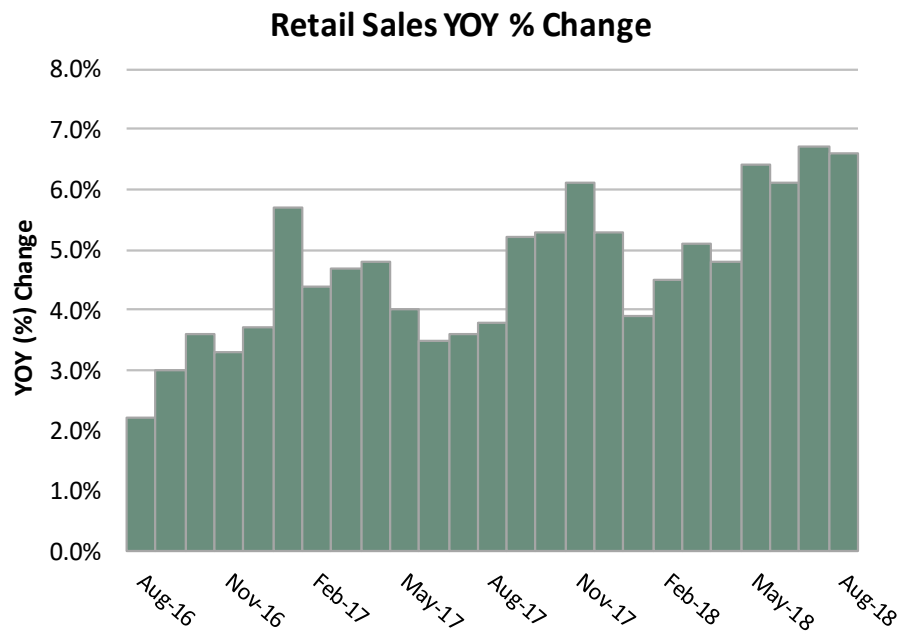
Source: US Department of Commerce

The Consumer Price Index (CPI) was up 2.7% year-over-year in August, versus up 2.9% year-over-year in July. Core CPI (CPI less food and energy) was up 2.2% year-over-year in August, down from 2.4% year-over-year in July. The Personal Consumption Expenditures (PCE) index was up 2.2% year-over-year in August, down slightly from 2.3% year-over-year in July. Core PCE (excluding food and energy) was up 2.0% on a year-over-year basis in August, unchanged from 2.0% in July. Core PCE inflation, which is the Fed's primary inflation gauge, remains in line with the Fed's 2.0% target.

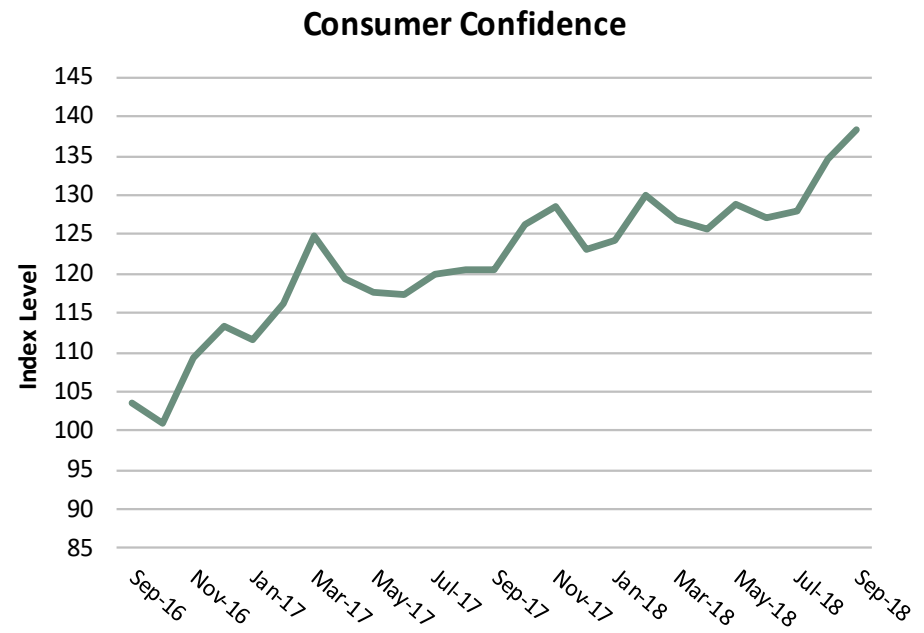
\*Please see the disclosures on front page of this presentation.



## Consumer



Source: US Department of Commerce



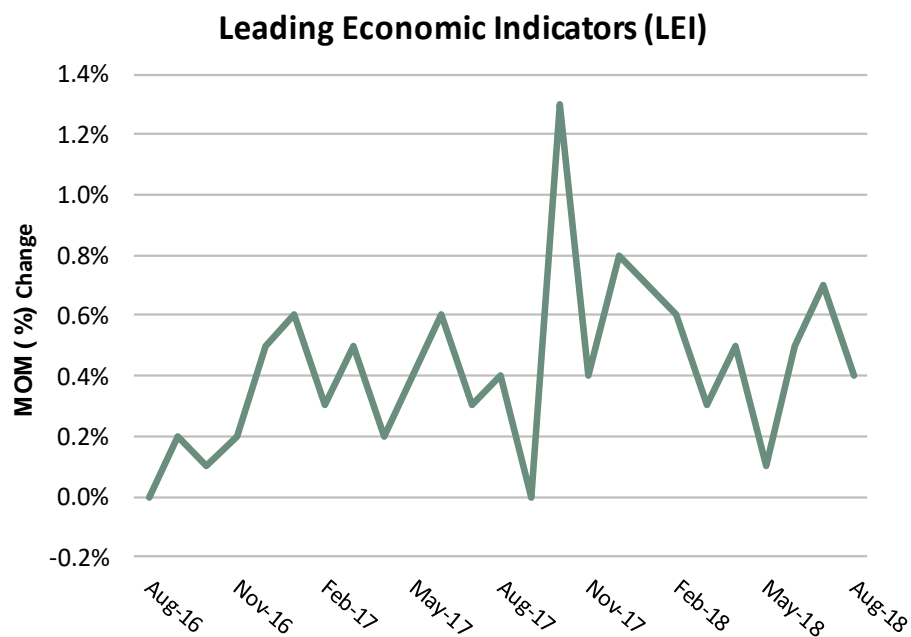
Source: The Conference Board

On a year-over-year basis, retail sales were up 6.6% in August, versus up 6.7% year-over-year in July. On a month-over-month basis, retail sales increased just 0.1% in August, following an upwardly revised increase of 0.7% in July. Strong sales in July were somewhat offset by softer trends in August, but the overall pace of consumer spending in the third quarter appears solid. The Consumer Confidence Index remains very strong at 138.4 in September, up from 134.7 in August. Ongoing strength in the labor market continues to support consumer confidence and spending trends.

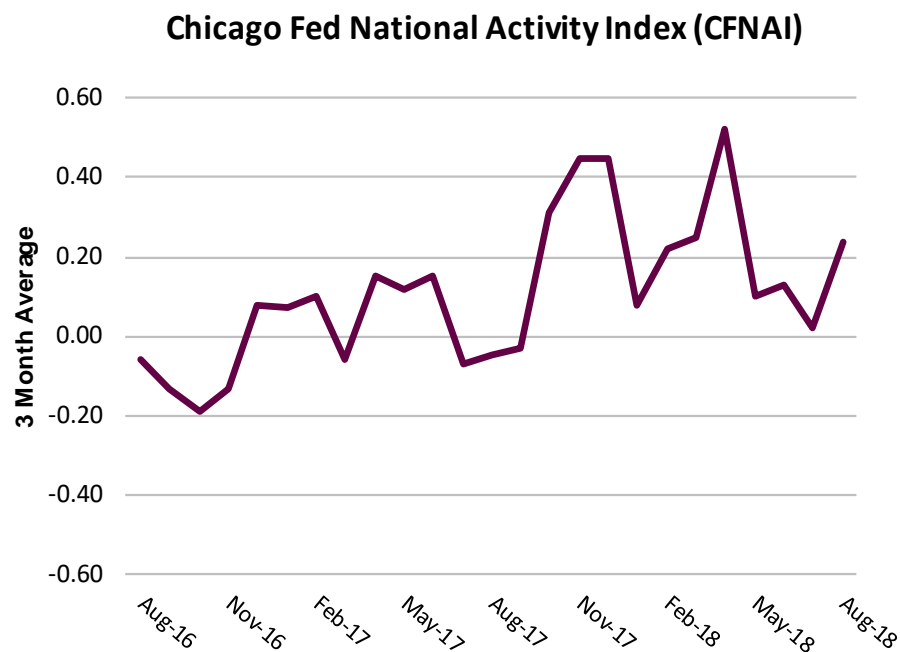
*\*Please see the disclosures on front page of this presentation.*



## Economic Activity



Source: The Conference Board



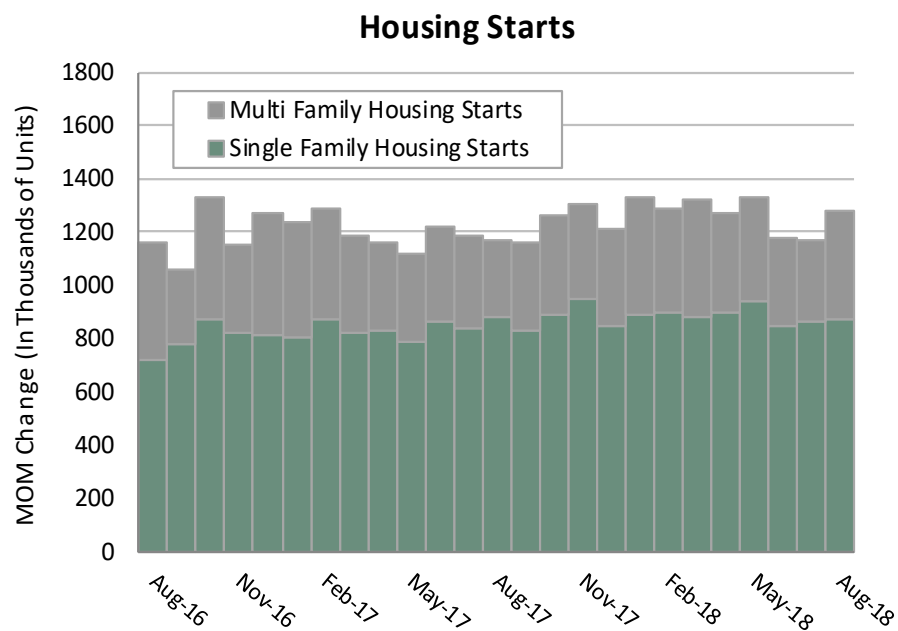
Source: Federal Reserve Bank of Chicago

The Index of Leading Economic Indicators (LEI) rose 0.4% month-over-month in August, following a 0.7% increase in July. According to the Conference Board, the index points to solid US economic growth for the remainder of the year. However, the Conference Board also warns that industrial companies that are more sensitive to business cycles should prepare for a possible moderation in economic growth next year. The Chicago Fed National Activity Index (CFNAI) was unchanged month-over-month in August at 0.18, suggesting that economic activity remains steady. On a 3-month moving average basis, the index increased to 0.24 in August from 0.02 in July.

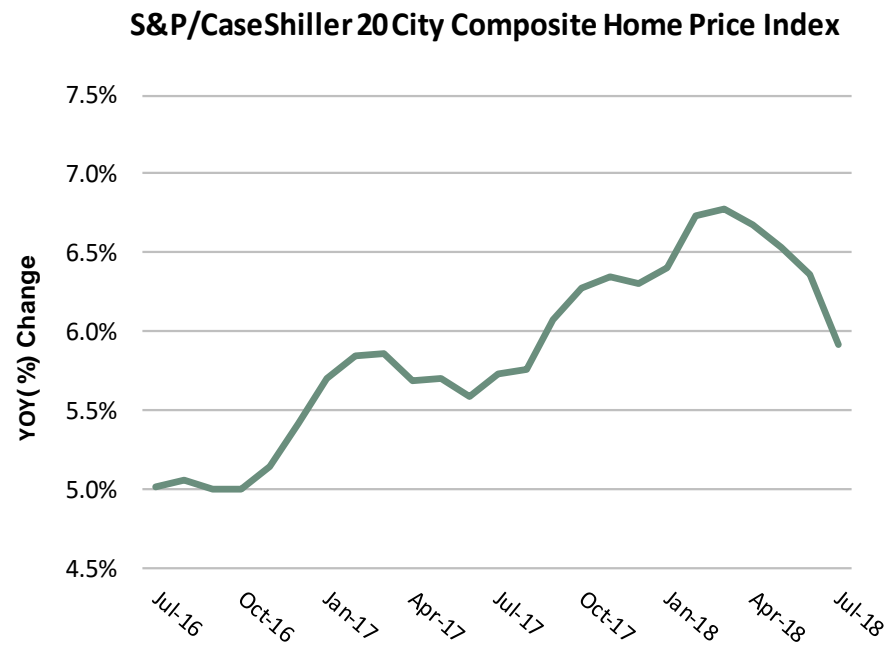
*\*Please see the disclosures on front page of this presentation.*



# Housing



Source: US Department of Commerce



Source: S&P; Please see the disclosures at the end of this presentation.

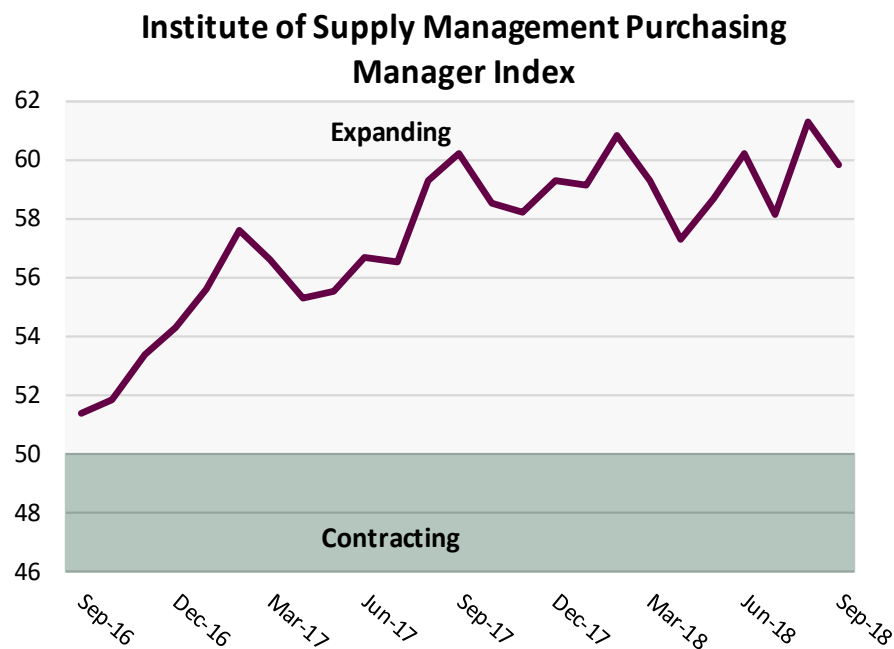
Total housing starts increased 9.2% in August. Single-family starts increased 1.9% in August while multi-family starts surged 29%. However, permits fell 5.7% in August. According to the Case-Shiller 20-City home price index, home prices were up 5.9% year-over-year in July, versus 6.4% in June. Housing data tends to be volatile on a month-over-month basis. Broadly speaking, the housing sector is facing a few different headwinds including supply constraints, rising mortgage interest rates, and a shortage of skilled labor, and housing trends have softened.

\*Please see the disclosures on front page of this presentation.

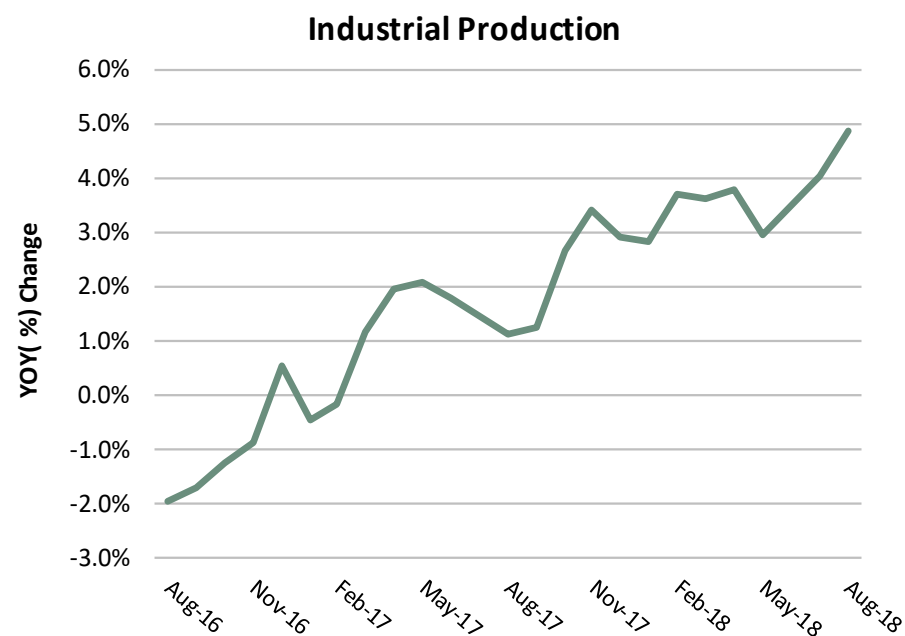




# Manufacturing



Source: Institute for Supply Management



Source: Federal Reserve

The Institute for Supply Management (ISM) manufacturing index edged down to 59.8 in September from 61.3 in August (the highest level since May 2004). A reading above 50.0 suggests the manufacturing sector is expanding. The Industrial Production index was up 4.9% year-over-year in August versus up 4.0% year-over-year in July. On a month-over-month basis, the manufacturing component of the index edged up just 0.2% in August, following a 0.3% increase in July, pointing to modest growth in the sector. Capacity Utilization increased to 78.1% in August from 77.9% in July, but remains below the long-run average of 79.8% indicating there is still excess capacity for growth.

*\*Please see the disclosures on front page of this presentation.*

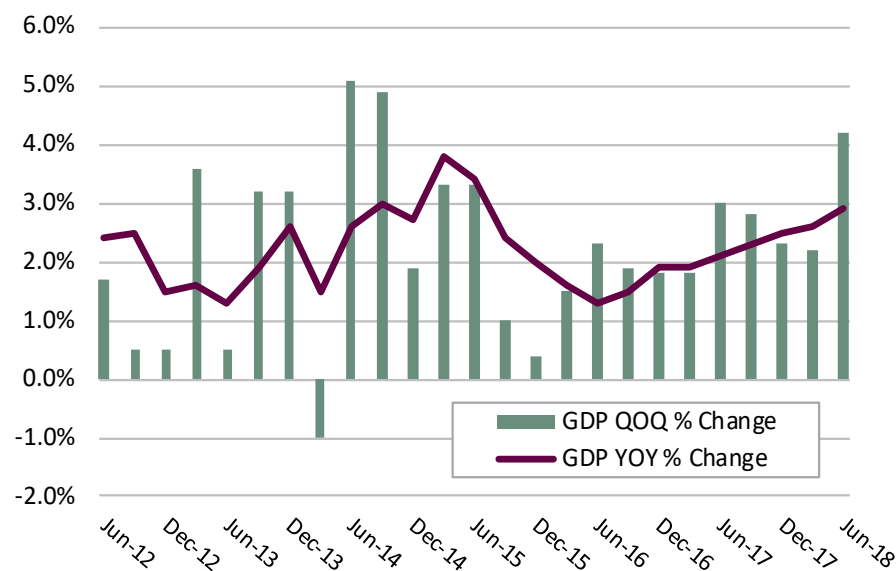


## Gross Domestic Product (GDP)

Components of GDP	9/17	12/17	3/18	6/18
Personal Consumption Expenditures	1.5%	2.6%	0.4%	2.6%
Gross Private Domestic Investment	1.5%	0.1%	1.6%	-0.1%
Net Exports and Imports	0.0%	-0.9%	0.0%	1.2%
Federal Government Expenditures	-0.1%	0.3%	0.2%	0.2%
State and Local (Consumption and Gross Investment)	-0.1%	0.2%	0.1%	0.2%
<b>Total</b>	<b>2.8%</b>	<b>2.3%</b>	<b>2.2%</b>	<b>4.2%</b>

Source: US Department of Commerce

### Gross Domestic Product (GDP)



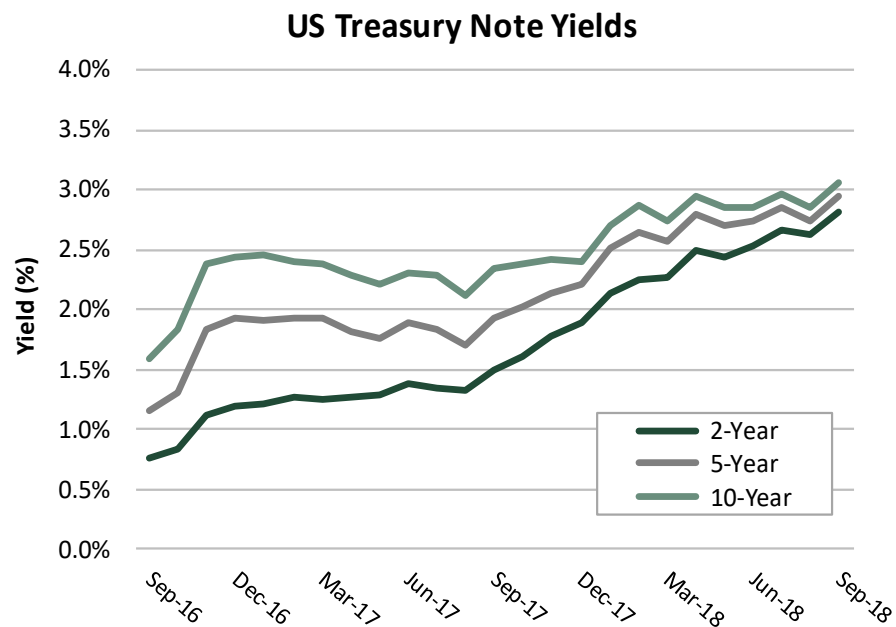
Source: US Department of Commerce

Annualized second quarter GDP grew at an annualized pace of 4.2%, according to the third estimate, following growth of 2.2% in the first quarter. Consumer spending and exports were particularly strong in the second quarter. Market participants estimate the economy grew 3.0% in the third quarter. GDP growth is expected to ease back toward the 2.5%-3.0% range in the fourth quarter.

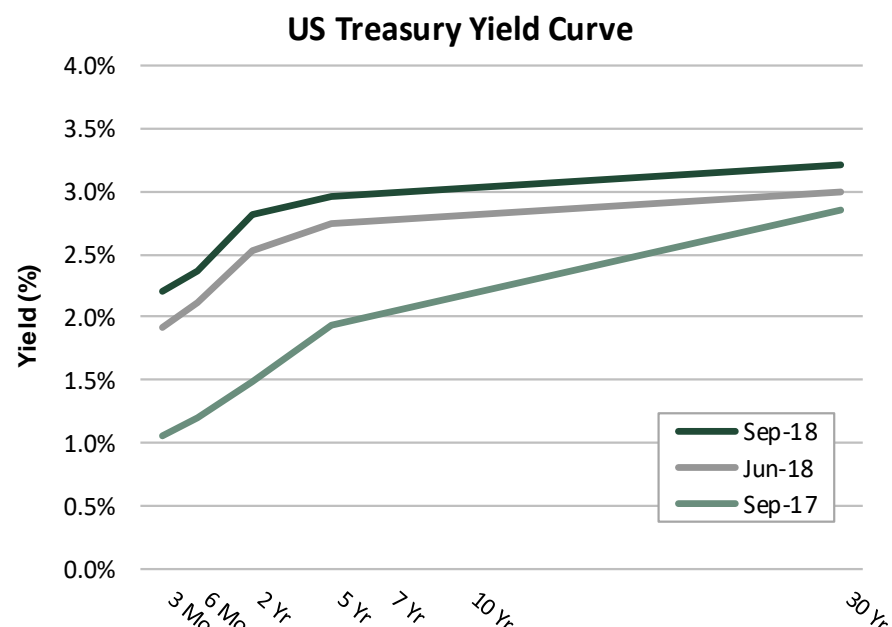
\*Please see the disclosures on front page of this presentation.



# Bond Yields



Source: Bloomberg



Source: Bloomberg

On a year-over-year basis, Treasury yields have increased and the Treasury yield curve has flattened. The spread between 2-Year and 10-year Treasury yields has narrowed from 85 basis points to 24 basis points, year-over-year as of September month-end. Rate hikes by the Federal Reserve have put upward pressure on rates, while supply and demand imbalances, technical factors, and subdued inflation expectations have contributed to the curve flattening.

*\*Please see the disclosures on front page of this presentation.*





## Section 2 | Account Profile

## Investment Objectives

The investment objectives of the Client are first, to provide safety of principal to ensure the preservation of capital in the overall portfolio; second, to provide adequate liquidity to meet all requirements that may be reasonably anticipated; and third, to earn a commensurate rate of return.

## Chandler Asset Management Performance Objective

The performance objective for the Client is to earn a return that equals or exceeds the return on an index of 1-3 Year Treasury notes.

## Strategy

In order to achieve these objectives, we invest in high quality fixed income securities consistent with the Client's investment policy and state legal requirements.

## Sample Client

*Assets managed by Chandler Asset Management are in full compliance with State law and the Client's investment policy.*

Category	Standard	Comment
Treasury Issues	No Limit	<i>Complies</i>
Agency Issues	No Limit	<i>Complies</i>
Supranationals	"AA" rated or better by a NRSRO; 20% maximum; 10% max per issuer; Issued by IBRD, IFC or IADB only	<i>Complies</i>
Municipal Issues	"A" rated or equivalent by a NRSRO; 30% maximum; 5% max per issuer	<i>Complies</i>
Banker's Acceptances	"A-1" rated or equivalent by a NRSRO; "A" rated issuer or equivalent by a NRSRO, if the bank has senior debt outstanding; 40% maximum; 5% max per issuer; 180 days max maturity	<i>Complies</i>
Commercial Paper	"A-1" rated or equivalent by a NRSRO; "A" rated issuer or equivalent by a NRSRO, if any long-term debt; 25% maximum; 5% max per issuer; 270 days max maturity; Entity organized and operating in the U.S. and has total assets >\$500 million	<i>Complies</i>
Negotiable CDs	"A-1" short-term rated or "A" long-term rated issuer or equivalent by a NRSRO and having assets in excess of \$10 billion; 30% maximum (combined NCDs, CDs); 5% max per issuer; 2 years max maturity	<i>Complies</i>
Non-Negotiable CDs	30% maximum (combined NCDs, CDs); 5% max per issuer; Collateralized or FDIC Insured; 2 years max maturity	<i>Complies</i>
Medium Term Notes	"A" rated or equivalent by a NRSRO; 30% maximum; 5% max per issuer; Issued by corporations organized and operating within the U.S. or by depository institutions licensed by the U.S.	<i>Complies</i>
Asset-Backed (ABS), Mortgage-Backed Securities; Pass-Throughs; CMOs	"AAA" rated or equiv by a NRSRO; "A" rated issuer by a NRSRO; 20% max (combined mortgage-backed and asset-backed, MPTs, CMOs); 5% max per issuer	<i>Complies</i>
Money Market Mutual Funds and Mutual Funds	Highest rating or "AAA" rated by two NRSROs; SEC registered adviser with AUM >\$500 million and experience greater than 5 years; 10% per one Mutual Fund; 20% maximum in Money Market Mutual Funds; 20% maximum combined of total portfolio in these securities	<i>Complies</i>
Repurchase Agreements	"A-1" or equivalent short term rating; "A" rated long term issuer or equivalent; 30 days max maturity; Not used by IA	<i>Complies</i>
Rev. Repo Agreements	10% maximum; 30 days max maturity; Not used by IA	<i>Complies</i>
LAIF	Pursuant to California Govt Code Section 16429.1; Not used by IA	<i>Complies</i>
LA County Pool	5% max; Not used by IA	<i>Complies</i>
Prohibited	Derivative structures such as Range Notes, Dual Index Notes, Inverse floaters, Interest-only strips from mortgaged backed securities; Zero interest accrual securities; Orange County Pool	<i>Complies</i>
Credit Quality	The City shall not purchase any security rated "A1" and/ or "A+" or below if that security has been placed on "credit watch" for a possible downgrade by a NRSRO.	<i>Complies</i>
Max Per Issuer	5% of portfolio (except U.S. government issuers, Supranationals, investment pools, Mutual Funds, and Money Market Funds)	<i>Complies</i>
Maximum maturity	5 years	<i>Complies</i>

*\*Please see the disclosures on front page of this presentation.*



# Portfolio Characteristics

As of September 30, 2018

## Sample Client

	9/30/2018		6/30/2018
	Benchmark*	Portfolio	Portfolio
Average Maturity (yrs)	1.85	1.87	1.82
Average Modified Duration	1.78	1.69	1.64
Average Purchase Yield	n/a	1.92%	1.78%
Average Market Yield	2.85%	2.90%	2.67%
Average Quality**	AAA	AA/Aa1	AA/Aa2
Total Market Value		195,727,630	194,921,818

\*ICE BAML 1-3 Yr US Treasury Index

\*\*Benchmark is a blended rating of S&P, Moody's, and Fitch. Portfolio is S&P and Moody's respectively.

\*Please see the disclosures on front page of this presentation.

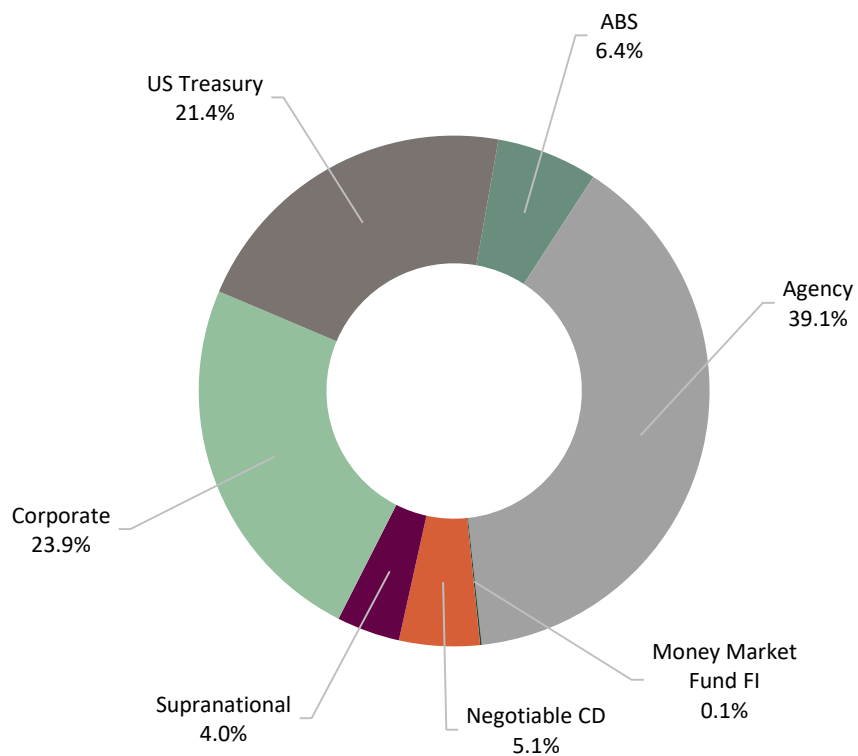


# Sector Distribution

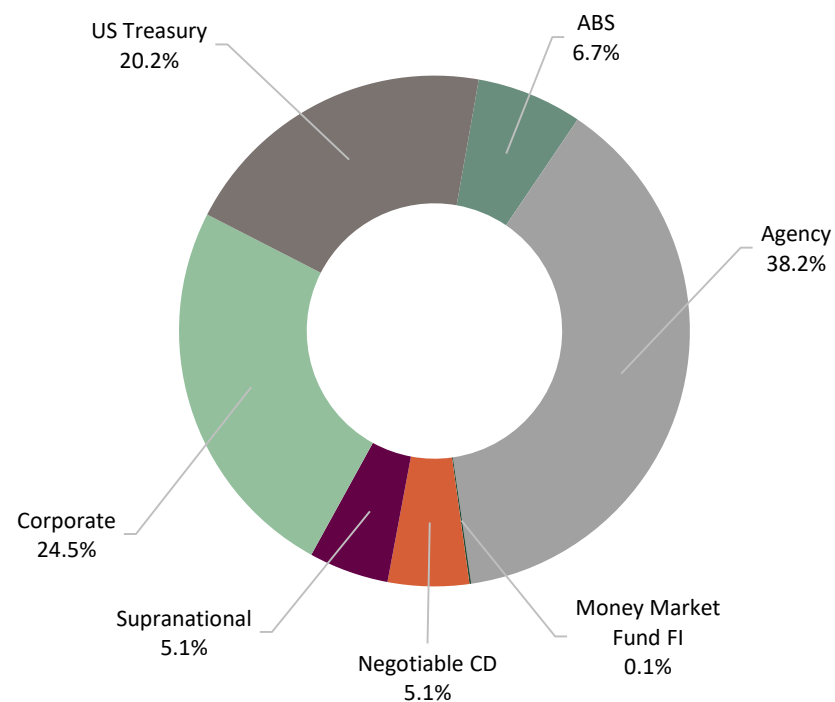
As of September 30, 2018

## Sample Client

September 30, 2018



June 30, 2018



\*Please see the disclosures on front page of this presentation.

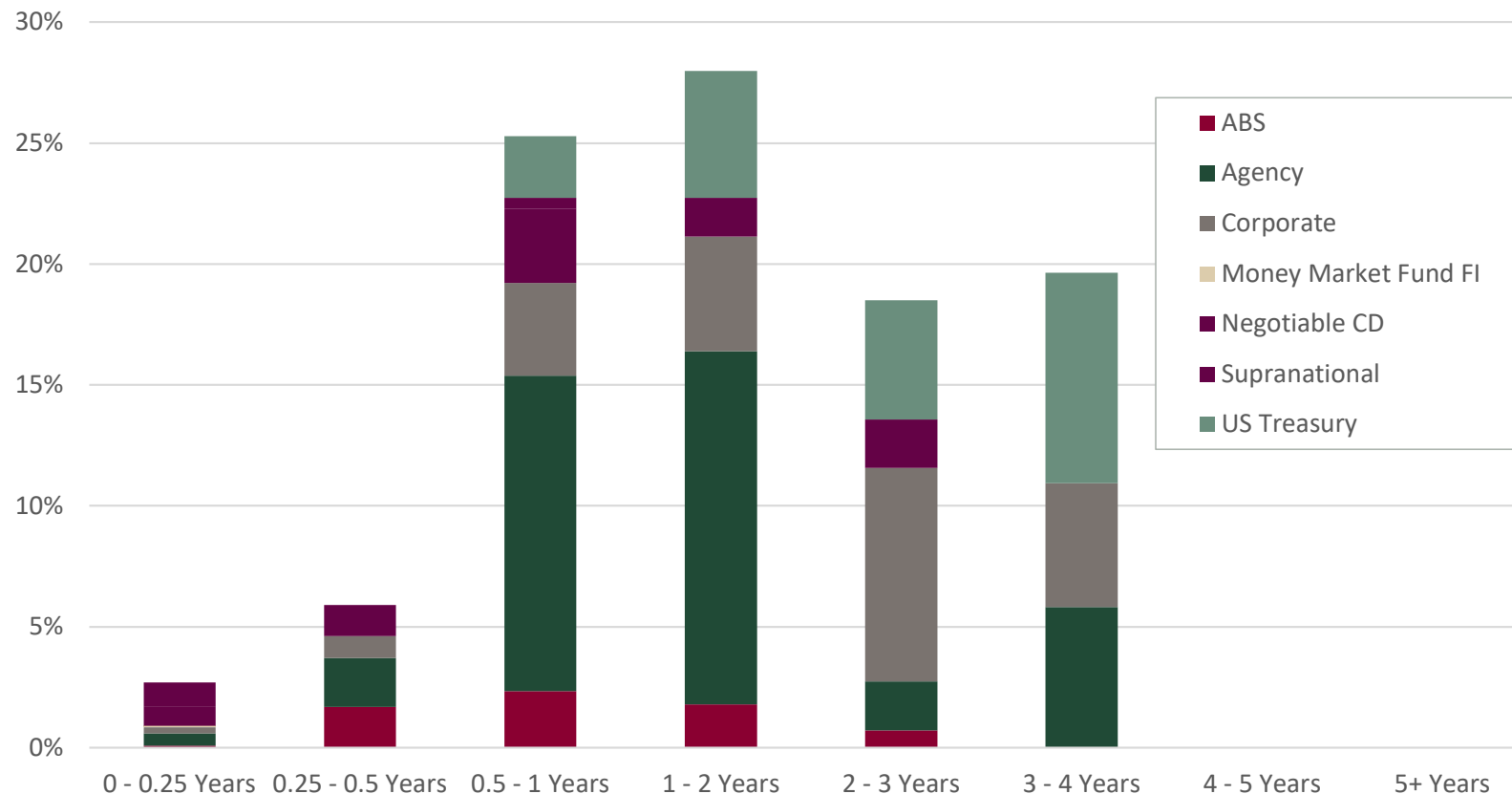




# Duration Allocation

As of September 30, 2018

## Sample Client



	0 - 0.25	0.25 - 0.50	0.50 - 1	1 - 2	2 - 3	3 - 4	4 - 5	5+
09/30/18	2.7%	5.9%	25.3%	28.0%	18.5%	19.6%	0.0%	0.0%

\*Please see the disclosures on front page of this presentation.

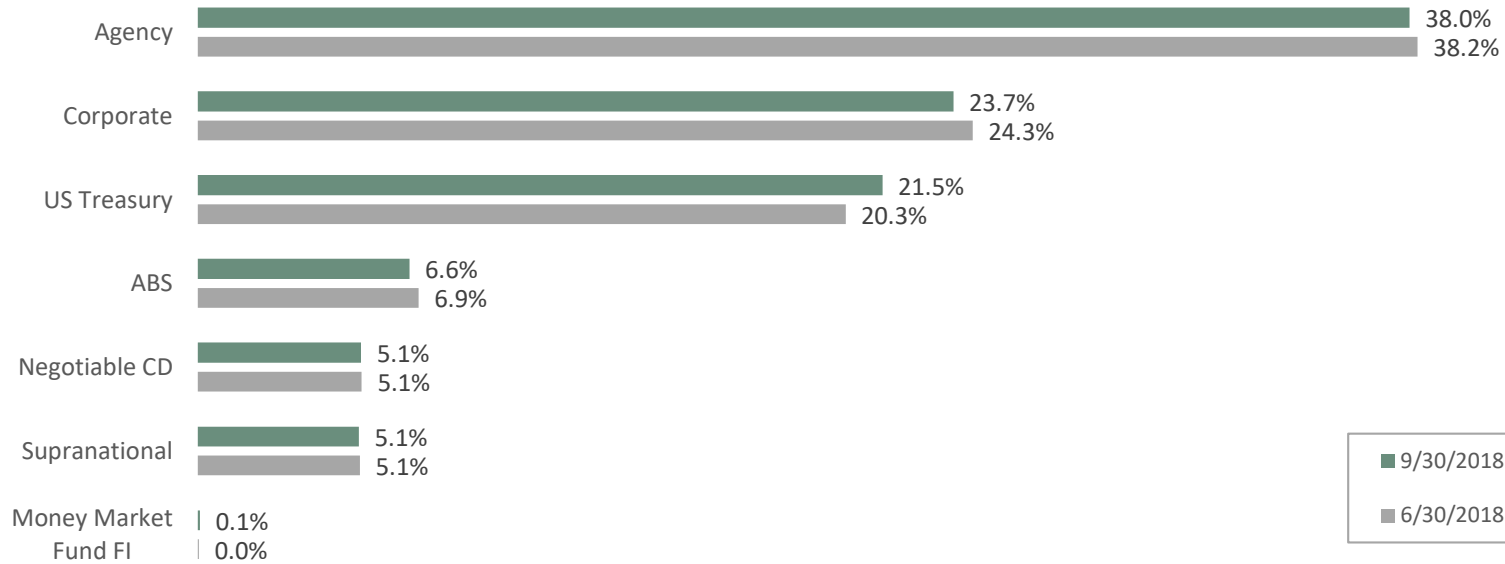


# Portfolio Allocation & Duration Changes

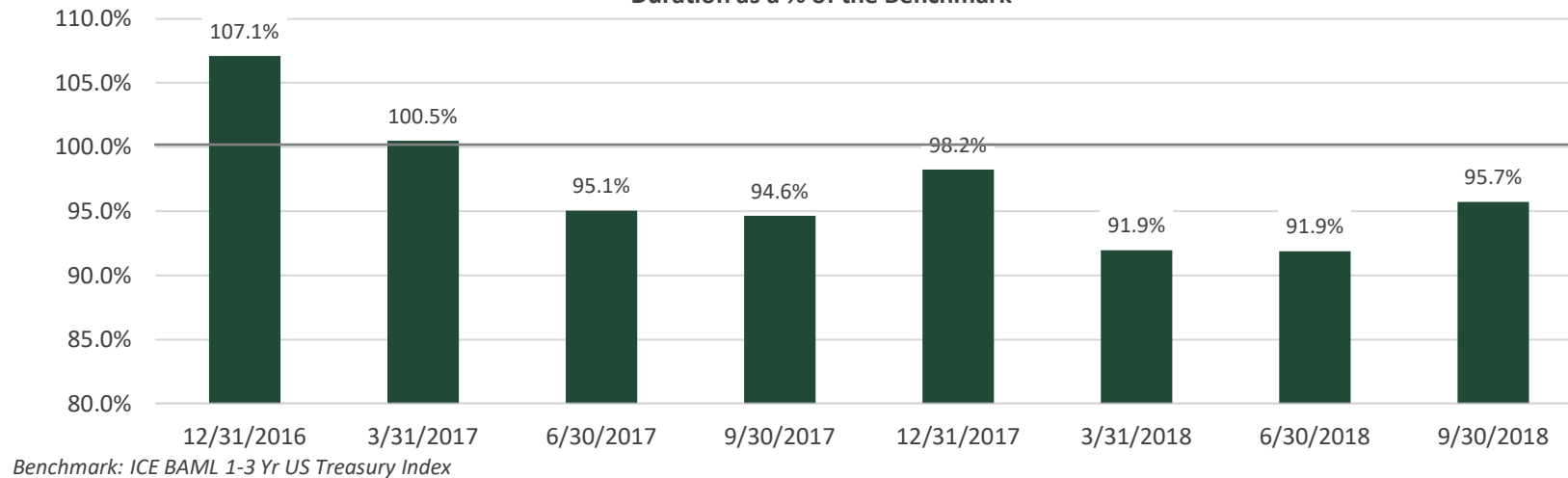
As of September 30, 2018

## Sample Client

### Portfolio Allocation



### Duration as a % of the Benchmark



\*Please see the disclosures on front page of this presentation.



## Sample Client

Issue Name	Investment Type	% Portfolio
Sample Government Issuer	US Treasury	21.44%
Sample Government Agency	Agency	14.11%
Sample Government Agency	Agency	12.32%
Sample Government Agency	Agency	11.28%
Sample Corporate Issuer	ABS	1.60%
Sample Supranational	Supranational	1.60%
Sample Corporate Issuer	Corporate	1.59%
Sample Corporate Issuer	ABS	1.48%
Sample Corporate Issuer	Corporate	1.41%
Sample Government Agency	Agency	1.38%
Sample Corporate Issuer	Corporate	1.37%
Sample Supranational	Supranational	1.30%
Sample Corporate Issuer	Corporate	1.25%
Sample Corporate Issuer	Corporate	1.24%
Sample Corporate Issuer	Corporate	1.23%
Sample Corporate Issuer	Corporate	1.20%
Sample Corporate Issuer	Corporate	1.18%
Sample Corporate Issuer	Corporate	1.16%
Sample Corporate Issuer	Supranational	1.14%
Sample Corporate Issuer	Corporate	1.13%
Sample Corporate Issuer	Corporate	1.06%
Sample Corporate Issuer	Corporate	1.03%
Sample Corporate Issuer	Corporate	1.02%
Sample Corporate Issuer	ABS	1.01%
Sample Corporate Issuer	Corporate	1.00%
Sample Corporate Issuer	Corporate	1.00%
Sample Corporate Issuer	Negotiable CD	0.88%
Sample Corporate Issuer	Negotiable CD	0.88%
Sample Corporate Issuer	Negotiable CD	0.87%
Sample Corporate Issuer	ABS	0.83%
Sample Corporate Issuer	ABS	0.83%
Sample Corporate Issuer	Corporate	0.78%
Sample Corporate Issuer	Negotiable CD	0.77%
Sample Corporate Issuer	Corporate	0.76%
Sample Corporate Issuer	Corporate	0.76%
Sample Corporate Issuer	Corporate	0.75%
Sample Corporate Issuer	Negotiable CD	0.64%
Sample Corporate Issuer	Negotiable CD	0.64%

*\*Please see the disclosures on front page of this presentation.*



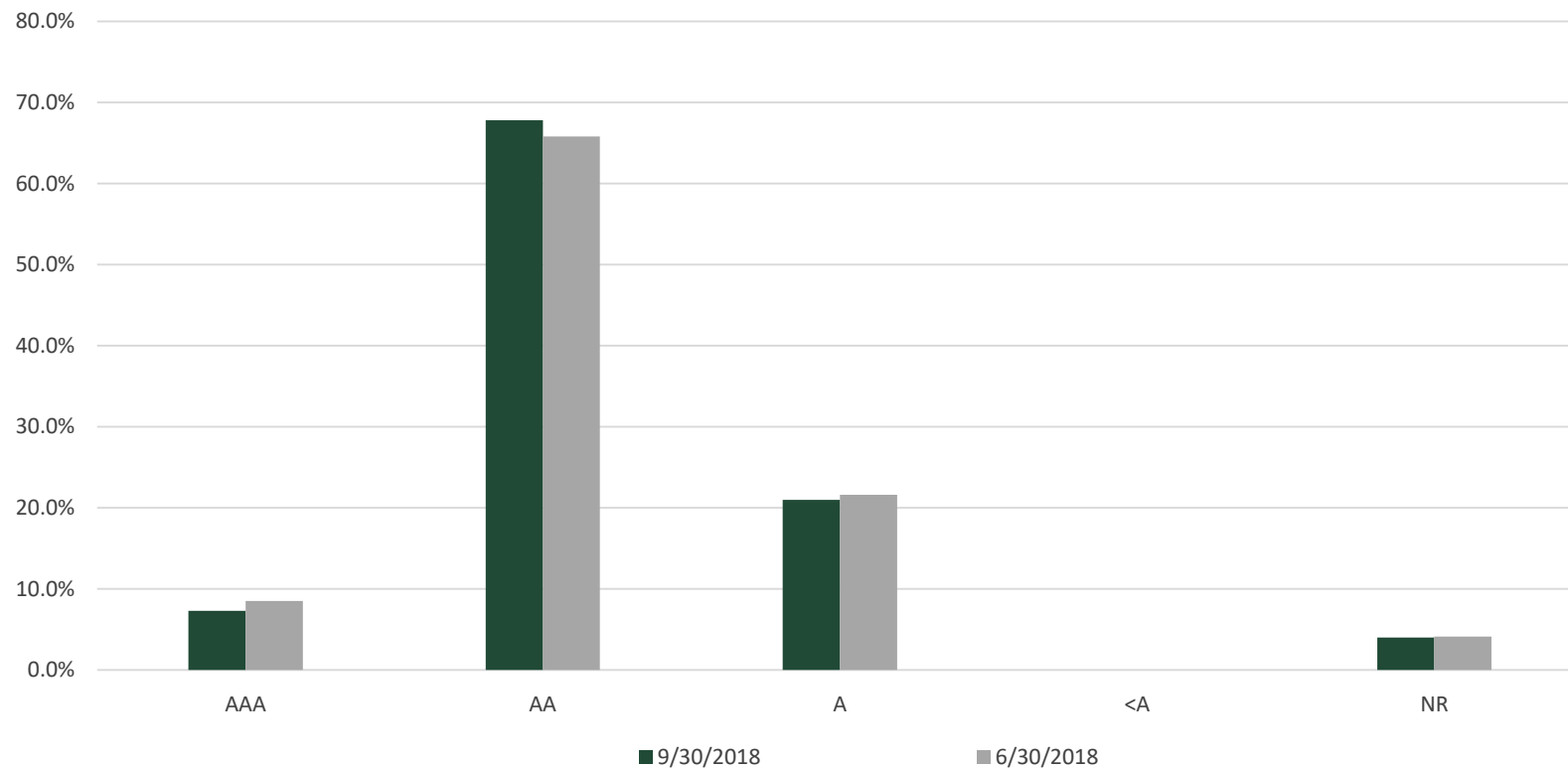
## Sample Client

Issue Name	Investment Type	% Portfolio
Sample Corporate Issuer	ABS	0.63%
Sample Corporate Issuer	Corporate	0.62%
Sample Corporate Issuer	Corporate	0.60%
Sample Corporate Issuer	Corporate	0.50%
Sample Corporate Issuer	Negotiable CD	0.44%
Sample Corporate Issuer	Corporate	0.32%
Sample Corporate Issuer	Corporate	0.25%
Sample Corporate Issuer	Corporate	0.25%
Sample Corporate Issuer	Corporate	0.23%
Sample Corporate Issuer	Corporate	0.12%
Sample Money Market Fund	Money Market Fund FI	0.07%
Sample Corporate Issuer	Corporate	0.06%
<b>TOTAL</b>		<b>100.00%</b>

# Quality Distribution

As of September 30, 2018

## Sample Client September 30, 2018 vs. June 30, 2018



	AAA	AA	A	<A	NR
9/30/18	7.3%	67.8%	21.0%	0.0%	4.0%
6/30/18	8.5%	65.8%	21.6%	0.0%	4.1%

Source: S&P Ratings

\*Please see the disclosures on front page of this presentation.

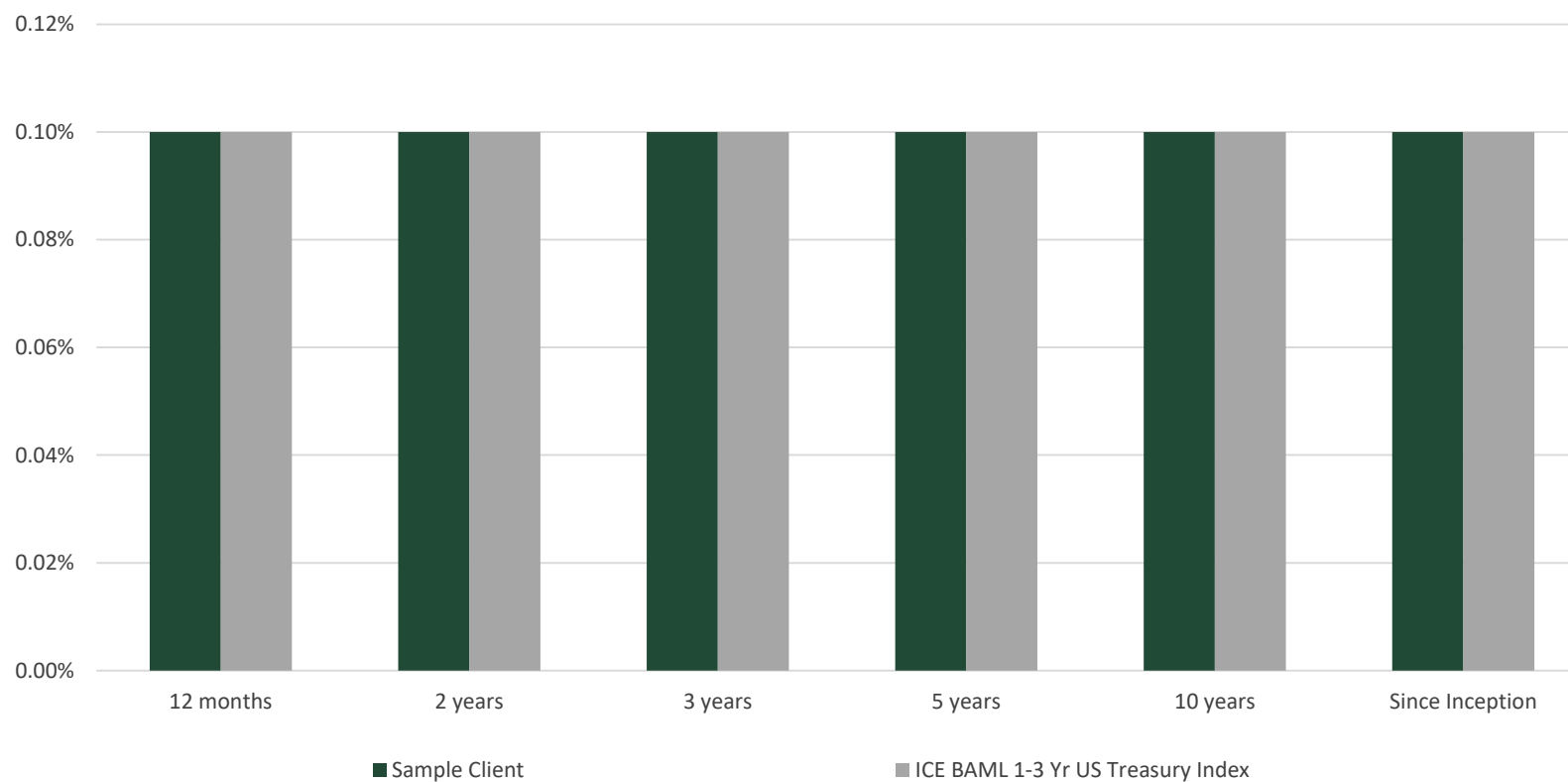


# Investment Performance

As of September 30, 2018

## Sample Client

Total Rate of Return Annualized Since Inception 03/31/1991



Annualized

TOTAL RATE OF RETURN	Annualized						
	3 months	12 months	2 years	3 years	5 years	10 years	Since Inception
Sample Client	%	%	%	%	%	%	%
ICE BAML 1-3 Yr US Treasury Index	%	%	%	%	%	%	%

Total rate of return: A measure of a portfolio's performance over time. It is the internal rate of return, which equates the beginning value of the portfolio with the ending value; it includes interest earnings, realized and unrealized gains and losses in the portfolio.

\*Please see the disclosures on front page of this presentation.





## Section 3 | Portfolio Holdings

# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>ABS</b>									
Sample CUSIP	Sample Issuer	23,106.49	02/22/2017	23,106.40	99.94	23,093.70	0.01%	Aaa / NR	0.96
	1.500% Due 10/15/2019		1.50%	23,106.46	5.94%	15.40	(12.76)	AAA	0.03
Sample CUSIP	Sample Issuer	71,158.62	03/21/2017	71,158.25	99.87	71,068.24	0.04%	Aaa / NR	1.21
	1.470% Due 01/15/2020		1.47%	71,158.46	2.79%	46.49	(90.22)	AAA	0.10
Sample CUSIP	Sample Issuer	201,555.76	07/11/2017	201,538.24	99.75	201,044.53	0.10%	Aaa / NR	1.46
	1.590% Due 04/15/2020		1.60%	201,546.48	2.73%	142.43	(501.95)	AAA	0.22
Sample CUSIP	Sample Issuer	534,686.88	08/16/2017	534,665.86	99.68	532,966.77	0.27%	Aaa / NR	1.54
	1.560% Due 05/15/2020		1.57%	534,675.04	2.76%	370.72	(1,708.27)	AAA	0.27
Sample CUSIP	Sample Issuer	130,734.33	08/01/2016	130,730.83	99.33	129,864.42	0.07%	Aaa / AAA	1.80
	1.140% Due 08/17/2020		1.14%	130,732.77	2.77%	66.24	(868.35)	NR	0.41
Sample CUSIP	Sample Issuer	131,820.82	03/22/2016	131,795.25	99.59	131,285.36	0.07%	Aaa / AAA	1.88
	1.560% Due 09/15/2020		1.58%	131,810.09	2.79%	91.40	(524.73)	NR	0.33
Sample CUSIP	Sample Issuer	2,022,496.59	01/23/2018	2,022,289.89	99.66	2,015,710.97	1.03%	Aaa / AAA	1.96
	2.100% Due 10/15/2020		2.12%	2,022,347.21	2.82%	1,887.66	(6,636.24)	NR	0.47
Sample CUSIP	Sample Issuer	1,150,000.00	02/21/2018	1,149,949.75	99.80	1,147,664.35	0.59%	Aaa / NR	1.96
	2.420% Due 10/15/2020		2.44%	1,149,962.63	2.85%	1,236.89	(2,298.28)	AAA	0.48
Sample CUSIP	Sample Issuer	1,380,296.57	Various	1,370,161.13	99.17	1,368,819.20	0.70%	Aaa / NR	2.21
	1.320% Due 01/15/2021		1.82%	1,372,638.42	2.95%	202.44	(3,819.22)	AAA	0.51
Sample CUSIP	Sample Issuer	220,000.00	03/07/2017	219,974.11	99.21	218,272.78	0.11%	Aaa / AAA	2.30
	1.730% Due 02/16/2021		1.74%	219,984.87	2.99%	169.16	(1,712.09)	NR	0.63
Sample CUSIP	Sample Issuer	259,354.25	01/24/2017	259,331.58	99.19	257,260.48	0.13%	Aaa / NR	2.62
	1.700% Due 06/15/2021		1.71%	259,340.66	3.08%	195.96	(2,080.18)	AAA	0.59
Sample CUSIP	Sample Issuer	375,854.11	03/21/2017	375,831.74	99.02	372,189.53	0.19%	Aaa / NR	2.72
	1.720% Due 07/21/2021		1.73%	375,840.02	3.08%	179.57	(3,650.49)	AAA	0.72
Sample CUSIP	Sample Issuer	700,000.00	03/21/2017	699,640.58	99.22	694,569.40	0.36%	Aaa / NR	2.79
	1.780% Due 08/16/2021		1.81%	699,771.24	3.04%	553.78	(5,201.84)	AAA	0.62
Sample CUSIP	Sample Issuer	380,000.00	03/22/2017	379,969.26	98.83	375,565.40	0.19%	NR / AAA	2.79
	1.760% Due 08/16/2021		1.77%	379,980.43	3.07%	278.67	(4,415.03)	AAA	0.89
Sample CUSIP	Sample Issuer	875,000.00	06/20/2017	874,924.31	98.65	863,198.00	0.44%	Aaa / AAA	2.79
	1.680% Due 08/16/2021		1.69%	874,948.96	3.08%	653.33	(11,750.96)	NR	0.97
Sample CUSIP	Sample Issuer	250,000.00	07/11/2017	249,981.70	98.59	246,469.25	0.13%	Aaa / NR	2.96
	1.820% Due 10/15/2021		1.83%	249,987.26	3.13%	202.22	(3,518.01)	AAA	1.09
Sample CUSIP	Sample Issuer	485,000.00	11/22/2017	484,931.66	98.72	478,778.91	0.24%	Aaa / NR	3.06
	2.050% Due 11/22/2021		2.07%	484,947.50	3.10%	276.18	(6,168.59)	AAA	1.23

\*Please see the disclosures on front page of this presentation.





# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	Sample Issuer 1.770% Due 01/18/2022	735,000.00	08/09/2017 1.79%	734,872.62 734,907.46	98.36 3.08%	722,916.60 578.20	0.37% (11,990.86)	Aaa / AAA NR	3.22 1.26
Sample CUSIP	Sample Issuer 1.930% Due 01/18/2022	540,000.00	11/07/2017 1.94%	539,950.21 539,961.67	98.26 3.16%	530,618.04 376.35	0.27% (9,343.63)	Aaa / AAA NR	3.22 1.43
Sample CUSIP	Sample Issuer 1.990% Due 03/15/2022	675,000.00	11/14/2017 2.00%	674,947.62 674,959.07	98.72 3.19%	666,341.10 597.00	0.34% (8,617.97)	Aaa / AAA NR	3.37 1.08
Sample CUSIP	Sample Issuer 3.010% Due 05/18/2022	750,000.00	05/22/2018 3.03%	749,983.65 749,985.40	99.68 3.19%	747,636.00 815.21	0.38% (2,349.40)	NR / AAA AAA	3.55 1.99
Sample CUSIP	Sample Issuer 2.950% Due 08/22/2022	670,000.00	08/21/2018 2.98%	669,908.08 669,912.19	99.52 3.19%	666,793.38 549.03	0.34% (3,118.81)	Aaa / NR AAA	3.81 2.13
<b>TOTAL ABS</b>		<b>12,561,064.42</b>	<b>2.04%</b>	<b>12,549,642.72</b> <b>12,552,504.29</b>	<b>3.00%</b>	<b>12,462,126.41</b> <b>9,484.33</b>	<b>6.37%</b> <b>(90,377.88)</b>	<b>Aaa / AAA</b> <b>Aaa</b>	<b>2.58</b> <b>0.87</b>

Agency									
Sample CUSIP	Sample Issuer 1.290% Due 11/19/2018	1,000,000.00	03/03/2016 1.07%	1,005,970.00 1,000,108.55	99.95 2.21%	999,533.00 5,805.00	0.51% (575.55)	Aaa / AA+ AAA	0.05 0.05
Sample CUSIP	Sample Issuer 1.000% Due 02/26/2019	2,275,000.00	06/27/2016 0.78%	2,287,876.50 2,276,549.95	99.54 2.45%	2,264,532.73 4,107.64	1.16% (12,017.22)	Aaa / AA+ AAA	0.32 0.32
Sample CUSIP	Sample Issuer 1.500% Due 03/08/2019	1,700,000.00	02/09/2016 0.99%	1,726,214.00 1,702,967.18	99.68 2.42%	1,694,502.20 3,754.17	0.87% (8,464.98)	Aaa / AA+ AAA	0.35 0.35
Sample CUSIP	Sample Issuer 1.125% Due 04/15/2019	3,225,000.00	Various 1.13%	3,224,332.25 3,224,900.53	99.36 2.54%	3,204,366.45 1,612.50	1.64% (20,534.08)	Aaa / AA+ AAA	0.45 0.45
Sample CUSIP	Sample Issuer 1.750% Due 05/30/2019	275,000.00	05/13/2016 0.99%	281,270.00 276,187.29	99.52 2.58%	273,677.25 2,018.58	0.14% (2,510.04)	Aaa / AA+ AAA	0.58 0.57
Sample CUSIP	Sample Issuer 1.625% Due 06/14/2019	1,750,000.00	06/23/2016 1.01%	1,781,465.00 1,756,525.00	99.41 2.60%	1,739,601.50 10,822.05	0.89% (16,923.50)	Aaa / AA+ AAA	0.62 0.61
Sample CUSIP	Sample Issuer 1.125% Due 06/21/2019	3,130,000.00	06/02/2016 1.14%	3,128,685.40 3,129,725.98	99.07 2.60%	3,100,831.53 12,715.63	1.59% (28,894.45)	Aaa / AA+ AAA	0.64 0.63
Sample CUSIP	Sample Issuer 1.150% Due 07/01/2019	1,700,000.00	04/26/2016 1.15%	1,700,136.00 1,700,028.40	99.07 2.57%	1,684,125.40 6,516.67	0.86% (15,903.00)	Aaa / AA+ AAA	0.67 0.66
Sample CUSIP	Sample Issuer 0.875% Due 07/19/2019	5,550,000.00	Various 0.99%	5,532,705.00 5,545,619.83	98.76 2.63%	5,481,307.65 13,759.38	2.81% (64,312.18)	Aaa / AA+ AAA	0.72 0.71
Sample CUSIP	Sample Issuer 1.250% Due 08/01/2019	1,700,000.00	Various 1.36%	1,692,427.40 1,698,663.07	98.95 2.67%	1,682,172.10 5,312.50	0.86% (16,490.97)	Aaa / AA+ AAA	0.75 0.74
Sample CUSIP	Sample Issuer 0.875% Due 08/02/2019	2,335,000.00	07/29/2016 0.93%	2,331,077.20 2,334,018.40	98.67 2.67%	2,303,932.83 5,051.06	1.18% (30,085.57)	Aaa / AA+ AAA	0.75 0.74

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	Sample Issuer 1.375% Due 08/15/2019	1,330,000.00	07/18/2017	1,328,044.90	98.99	1,316,553.70	0.67%	Aaa / AA+	0.79
			1.45%	1,329,258.77	2.68%	3,860.69	(12,705.07)	AAA	0.78
Sample CUSIP	Sample Issuer 1.000% Due 08/28/2019	3,000,000.00	09/01/2016	2,992,620.00	98.64	2,959,233.00	1.51%	Aaa / AA+	0.82
			1.08%	2,997,968.81	2.69%	5,250.00	(38,735.81)	AAA	0.81
Sample CUSIP	Sample Issuer 1.250% Due 10/02/2019	1,700,000.00	02/22/2016	1,703,026.00	98.64	1,676,959.90	0.86%	Aaa / AA+	0.92
			1.20%	1,700,769.71	2.75%	1,711.81	(23,809.81)	AAA	0.90
Sample CUSIP	Sample Issuer 1.000% Due 10/24/2019	4,685,000.00	Various	4,627,508.05	98.31	4,605,659.54	2.35%	Aaa / AA+	0.98
			1.48%	4,663,269.62	2.76%	910.97	(57,610.08)	AAA	0.96
Sample CUSIP	Sample Issuer 1.375% Due 11/15/2019	4,695,000.00	Various	4,668,708.10	98.58	4,628,509.41	2.38%	Aaa / AA+	1.04
			1.57%	4,685,655.20	2.77%	29,767.61	(57,145.79)	AAA	1.01
Sample CUSIP	Sample Issuer 1.250% Due 12/13/2019	1,300,000.00	07/18/2016	1,307,865.00	98.35	1,278,548.70	0.66%	Aaa / AA+	1.12
			1.07%	1,302,577.34	2.76%	6,229.17	(24,028.64)	AAA	1.09
Sample CUSIP	Sample Issuer 1.500% Due 01/17/2020	5,390,000.00	Various	5,386,222.80	98.48	5,307,888.74	2.72%	Aaa / AA+	1.21
			1.52%	5,388,416.57	2.79%	23,356.67	(80,527.83)	AAA	1.18
Sample CUSIP	Sample Issuer 1.500% Due 02/28/2020	4,110,000.00	Various	4,100,117.06	98.30	4,040,187.54	2.07%	Aaa / AA+	1.33
			1.58%	4,105,777.72	2.81%	10,788.75	(65,590.18)	AAA	1.30
Sample CUSIP	Sample Issuer 1.375% Due 04/20/2020	5,215,000.00	Various	5,184,283.40	97.94	5,107,435.41	2.61%	Aaa / AA+	1.47
			1.59%	5,198,834.97	2.82%	2,191.03	(91,399.56)	AAA	1.44
Sample CUSIP	Sample Issuer 1.750% Due 06/12/2020	750,000.00	05/23/2017	753,637.50	98.22	736,626.00	0.38%	Aaa / AA+	1.62
			1.59%	751,921.51	2.89%	5,067.71	(15,295.51)	NR	1.57
Sample CUSIP	Sample Issuer 1.500% Due 07/30/2020	2,795,000.00	Various	2,793,152.80	97.69	2,730,457.86	1.40%	Aaa / AA+	1.75
			1.52%	2,793,917.32	2.86%	10,597.71	(63,459.46)	AAA	1.70
Sample CUSIP	Sample Issuer 1.875% Due 12/11/2020	4,000,000.00	01/17/2018	3,963,840.00	97.74	3,909,456.00	2.01%	Aaa / AA+	2.12
			2.20%	3,973,649.00	2.99%	29,166.67	(64,193.00)	NR	2.03
Sample CUSIP	Sample Issuer 3.000% Due 10/12/2021	650,000.00	10/22/2018	649,044.50	99.89	649,259.65	0.33%	Aaa / AA+	2.95
			3.05%	649,052.43	3.04%	1,029.17	207.22	NR	2.80
Sample CUSIP	Sample Issuer 2.000% Due 01/05/2022	1,600,000.00	09/27/2017	1,606,304.00	96.93	1,550,928.00	0.80%	Aaa / AA+	3.18
			1.90%	1,604,691.63	3.02%	10,311.11	(53,763.63)	AAA	3.03
Sample CUSIP	Sample Issuer 2.250% Due 03/11/2022	1,300,000.00	09/15/2017	1,324,271.00	97.49	1,267,401.20	0.65%	Aaa / AA+	3.36
			1.81%	1,318,210.68	3.04%	4,062.50	(50,809.48)	NR	3.20
Sample CUSIP	Sample Issuer 2.750% Due 06/10/2022	3,000,000.00	Various	2,987,747.50	98.99	2,969,823.00	1.54%	Aaa / AA+	3.61
			2.86%	2,988,759.74	3.05%	39,187.51	(18,936.74)	NR	3.36
Sample CUSIP	Sample Issuer 3.125% Due 09/09/2022	3,750,000.00	09/25/2018	3,765,750.00	100.16	3,756,180.00	1.93%	Aaa / AA+	3.86
			3.01%	3,765,357.34	3.08%	16,927.08	(9,177.34)	AAA	3.59
Sample CUSIP	Sample Issuer 2.500% Due 12/09/2022	1,750,000.00	08/27/2018	1,729,000.00	97.85	1,712,401.25	0.88%	Aaa / AA+	4.11
			2.80%	1,729,872.76	3.06%	17,256.94	(17,471.51)	NR	3.83

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	Sample Issuer 2.375% Due 01/19/2023	1,600,000.00	10/04/2018 3.10%	1,554,000.00 1,554,792.60	97.33 3.05%	1,557,241.60 10,766.67	0.80% 2,449.00	Aaa / AA+ AAA	4.22 3.95
<b>TOTAL Agency</b>		<b>77,260,000.00</b>	<b>1.59%</b>	<b>77,117,301.36</b> <b>77,148,047.90</b>	<b>2.77%</b>	<b>76,189,333.14</b> <b>299,914.95</b>	<b>39.08%</b> <b>(958,714.76)</b>	<b>Aaa / AA+</b> <b>Aaa</b>	<b>1.49</b> <b>1.43</b>

Corporate									
Sample CUSIP	Sample Issuer 1.300% Due 11/03/2018	485,000.00	10/29/2015 1.33%	484,515.00 484,999.11	99.99 2.85%	484,957.81 3,117.47	0.25% (41.30)	Aaa / AAA AA+	0.01 0.01
Sample CUSIP	Sample Issuer 1.700% Due 02/19/2019	380,000.00	02/16/2016 1.70%	379,954.40 379,995.42	99.65 2.87%	378,662.40 1,292.00	0.19% (1,333.02)	Aa3 / AA- A+	0.30 0.30
Sample CUSIP	Sample Issuer 1.700% Due 02/22/2019	1,060,000.00	02/16/2016 1.71%	1,059,819.80 1,059,981.40	99.67 2.75%	1,056,496.70 3,403.78	0.54% (3,484.70)	Aa1 / AA+ NR	0.31 0.31
Sample CUSIP	Sample Issuer 1.700% Due 03/15/2019	320,000.00	03/08/2016 1.73%	319,756.80 319,970.24	99.66 2.61%	318,921.60 695.11	0.16% (1,048.64)	Aa2 / AA A+	0.37 0.37
Sample CUSIP	Sample Issuer 2.125% Due 04/22/2019	500,000.00	09/13/2016 1.51%	507,860.00 501,426.08	99.66 2.86%	498,285.50 265.63	0.25% (3,140.58)	A2 / A- A+	0.47 0.47
Sample CUSIP	Sample Issuer 2.200% Due 04/25/2019	1,050,000.00	01/22/2016 1.91%	1,059,324.00 1,051,164.49	99.74 2.75%	1,047,226.95 385.00	0.54% (3,937.54)	A1 / A+ AA-	0.48 0.48
Sample CUSIP	Sample Issuer 1.400% Due 05/20/2019	1,000,000.00	05/17/2016 1.45%	998,600.00 999,744.29	99.24 2.80%	992,390.00 6,261.11	0.51% (7,354.29)	Aa3 / AA- A+	0.55 0.54
Sample CUSIP	Sample Issuer 1.100% Due 08/08/2019	1,000,000.00	08/01/2016 1.14%	998,970.00 999,736.62	98.77 2.73%	987,672.00 2,536.11	0.51% (12,064.62)	Aaa / AAA AA+	0.77 0.76
Sample CUSIP	Sample Issuer 1.300% Due 08/15/2019	1,215,000.00	Various 1.25%	1,216,847.45 1,215,489.53	98.82 2.82%	1,200,718.89 3,334.50	0.62% (14,770.64)	Aa2 / AA A+	0.79 0.77
Sample CUSIP	Sample Issuer 2.300% Due 09/11/2019	1,300,000.00	Various 1.97%	1,313,226.00 1,303,203.68	99.41 2.99%	1,292,363.80 4,152.77	0.66% (10,839.88)	A1 / A AA-	0.86 0.84
Sample CUSIP	Sample Issuer 1.400% Due 09/20/2019	1,225,000.00	Various 1.39%	1,225,368.25 1,225,109.30	98.77 2.81%	1,209,947.20 1,953.20	0.62% (15,162.10)	A1 / AA- NR	0.89 0.87
Sample CUSIP	Sample Issuer 2.250% Due 10/08/2019	250,000.00	12/06/2016 1.81%	253,052.50 251,007.65	99.36 2.94%	248,408.75 359.38	0.13% (2,598.90)	A1 / AA- A	0.94 0.92
Sample CUSIP	Sample Issuer 2.125% Due 10/28/2019	250,000.00	12/06/2016 1.86%	251,772.50 250,573.51	99.41 2.73%	248,530.00 44.27	0.13% (2,043.51)	A1 / AA- AA-	0.99 0.98
Sample CUSIP	Sample Issuer 1.800% Due 10/30/2019	245,000.00	10/23/2017 1.84%	244,808.90 244,904.97	98.84 2.99%	242,154.57 12.25	0.12% (2,750.40)	A2 / A A	1.00 0.98

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	Sample Issuer 5.000% Due 12/10/2019	1,000,000.00	12/06/2016 1.90%	1,090,000.00 1,033,175.18	102.15 3.01%	1,021,524.00 19,583.33	0.53% (11,651.18)	Aa3 / AA- NR	1.11 1.06
Sample CUSIP	Sample Issuer 1.900% Due 01/27/2020	1,635,000.00	02/01/2017 1.91%	1,634,329.65 1,634,721.51	98.53 3.12%	1,610,931.17 8,111.42	0.83% (23,790.34)	A1 / A A	1.24 1.21
Sample CUSIP	Sample Issuer 1.900% Due 02/07/2020	1,400,000.00	02/03/2017 1.92%	1,399,314.00 1,399,709.41	98.72 2.94%	1,382,085.60 6,206.67	0.71% (17,623.81)	Aa1 / AA+ NR	1.27 1.23
Sample CUSIP	Sample Issuer 2.200% Due 03/03/2020	495,000.00	02/28/2017 2.24%	494,485.20 494,770.78	98.68 3.21%	488,483.82 1,754.50	0.25% (6,286.96)	A2 / A- A	1.34 1.30
Sample CUSIP	Sample Issuer 1.800% Due 05/05/2020	125,000.00	05/02/2017 1.91%	124,601.25 124,799.53	98.03 3.14%	122,542.00 1,100.00	0.06% (2,257.53)	A1 / A+ A+	1.51 1.46
Sample CUSIP	Sample Issuer 1.800% Due 06/05/2020	1,500,000.00	05/24/2017 1.82%	1,499,130.00 1,499,538.01	98.04 3.07%	1,470,639.00 10,950.00	0.76% (28,899.01)	A2 / A A	1.60 1.54
Sample CUSIP	Sample Issuer 2.550% Due 08/18/2020	2,000,000.00	Various 2.14%	2,028,696.00 2,014,046.00	98.96 3.15%	1,979,198.00 10,341.66	1.02% (34,848.00)	A1 / A AA-	1.80 1.73
Sample CUSIP	Sample Issuer 1.850% Due 09/04/2020	645,000.00	09/05/2017 1.88%	644,458.20 644,666.39	97.79 3.10%	630,721.64 1,889.31	0.32% (13,944.75)	A3 / A A	1.85 1.79
Sample CUSIP	Sample Issuer 2.200% Due 12/14/2020	1,000,000.00	12/28/2016 2.25%	998,080.00 998,968.72	97.97 3.20%	979,692.00 8,372.22	0.50% (19,276.72)	A1 / A+ NR	2.12 2.03
Sample CUSIP	Sample Issuer 2.550% Due 01/08/2021	500,000.00	03/20/2018 2.93%	494,925.00 496,036.24	98.59 3.22%	492,925.50 4,002.08	0.25% (3,110.74)	A2 / A A	2.19 2.09
Sample CUSIP	Sample Issuer 2.150% Due 02/01/2021	450,000.00	10/23/2017 2.17%	449,793.00 449,857.32	97.42 3.35%	438,367.95 2,418.75	0.23% (11,489.37)	A2 / A- A+	2.26 2.16
Sample CUSIP	Sample Issuer 2.650% Due 02/05/2021	700,000.00	02/22/2018 2.81%	696,815.00 697,549.77	98.45 3.37%	689,152.10 4,431.39	0.35% (8,397.67)	A1 / A A	2.27 2.16
Sample CUSIP	Sample Issuer 2.800% Due 03/01/2021	1,000,000.00	02/26/2018 2.73%	1,002,060.00 1,001,598.05	98.73 3.37%	987,334.00 4,666.67	0.51% (14,264.05)	A1 / A+ NR	2.33 2.23
Sample CUSIP	Sample Issuer 2.500% Due 04/15/2021	1,500,000.00	09/05/2017 1.99%	1,525,950.00 1,517,468.29	98.00 3.35%	1,469,944.50 1,666.67	0.75% (47,523.79)	A1 / A AA-	2.46 2.35
Sample CUSIP	Sample Issuer 3.000% Due 05/11/2021	2,000,000.00	06/07/2018 3.13%	1,992,500.00 1,993,507.04	99.30 3.29%	1,985,900.00 28,333.33	1.03% (7,607.04)	A2 / A+ NR	2.53 2.38
Sample CUSIP	Sample Issuer 2.150% Due 05/18/2021	1,200,000.00	07/26/2017 2.06%	1,203,924.00 1,202,628.26	97.56 3.16%	1,170,692.40 11,681.67	0.60% (31,935.86)	Aa3 / A+ A+	2.55 2.43

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	Sample Issuer 3.250% Due 05/21/2021	2,385,000.00	Various 3.09%	2,395,533.45 2,393,997.40	99.67 3.39%	2,377,036.49 34,234.69	1.23% (16,960.91)	A2 / A A	2.56 2.40
Sample CUSIP	Sample Issuer 4.250% Due 05/24/2021	1,000,000.00	04/27/2018 3.03%	1,035,570.00 1,029,694.60	102.34 3.29%	1,023,414.00 18,534.72	0.53% (6,280.60)	Aa3 / AA- NR	2.56 2.38
Sample CUSIP	Sample Issuer 2.400% Due 06/07/2021	1,500,000.00	09/07/2018 3.24%	1,467,315.00 1,468,981.94	97.42 3.44%	1,461,345.00 14,400.00	0.75% (7,636.94)	A2 / A- AA-	2.60 2.47
Sample CUSIP	Sample Issuer 1.650% Due 07/12/2021	2,000,000.00	06/28/2018 3.14%	1,914,160.00 1,923,835.38	95.65 3.35%	1,912,942.00 9,991.67	0.98% (10,893.38)	A2 / A+ NR	2.70 2.59
Sample CUSIP	Sample Issuer 3.150% Due 08/09/2021	2,105,000.00	08/06/2018 3.16%	2,104,347.45 2,104,397.46	99.66 3.28%	2,097,836.69 15,103.38	1.08% (6,560.77)	A1 / A+ NR	2.78 2.62
Sample CUSIP	Sample Issuer 2.550% Due 12/09/2021	1,000,000.00	11/17/2017 2.40%	1,005,530.00 1,004,213.33	97.46 3.42%	974,568.00 10,058.33	0.50% (29,645.33)	A2 / A A+	3.11 2.92
Sample CUSIP	Sample Issuer 3.375% Due 12/10/2021	500,000.00	10/03/2018 3.39%	499,760.00 499,764.56	99.87 3.42%	499,344.50 984.38	0.26% (420.06)	A2 / A+ NR	3.11 2.92
Sample CUSIP	Sample Issuer 2.625% Due 01/24/2022	1,000,000.00	01/24/2018 2.72%	996,280.00 996,991.36	97.39 3.48%	973,927.00 7,072.92	0.50% (23,064.36)	A1 / A+ AA-	3.24 3.04
Sample CUSIP	Sample Issuer 2.450% Due 02/15/2022	2,000,000.00	05/15/2018 3.26%	1,943,080.00 1,950,059.97	97.00 3.42%	1,939,986.00 10,344.44	1.00% (10,073.97)	A2 / A NR	3.30 3.11
Sample CUSIP	Sample Issuer 2.625% Due 02/17/2022	1,735,000.00	Various 2.99%	1,713,723.60 1,715,143.28	97.05 3.58%	1,683,749.84 9,361.78	0.87% (31,393.44)	A2 / A A+	3.30 3.10
Sample CUSIP	Sample Issuer 2.500% Due 05/15/2022	2,000,000.00	06/07/2018 3.17%	1,950,780.00 1,955,688.27	96.79 3.47%	1,935,816.00 23,055.56	1.00% (19,872.27)	A1 / AA- A	3.54 3.31
Sample CUSIP	Sample Issuer 2.700% Due 01/06/2023	1,500,000.00	07/24/2018 3.38%	1,458,270.00 1,460,786.64	96.80 3.53%	1,452,025.50 12,937.50	0.75% (8,761.14)	A2 / A A	4.19 3.87
Sample CUSIP	Sample Issuer 2.700% Due 01/11/2023	1,000,000.00	09/07/2018 3.33%	974,710.00 975,524.78	96.70 3.55%	967,043.00 8,250.00	0.50% (8,481.78)	Aa3 / AA- A+	4.20 3.89
<b>TOTAL US Corporate</b>		<b>47,155,000.00</b>	<b>2.46%</b>	<b>47,051,996.40</b> <b>46,969,425.76</b>	<b>3.20%</b>	<b>46,425,903.87</b> <b>327,651.62</b>	<b>23.89%</b> <b>(543,521.89)</b>	<b>A1 / A+</b> <b>A+</b>	<b>2.14</b> <b>2.02</b>
<b>Money Market Fund FI</b>									
Sample CUSIP	Sample Issuer	128,119.11	Various 2.03%	128,119.11 128,119.11	1.00 2.03%	128,119.11 0.00	0.07% 0.00	Aaa / AAA AAA	0.00 0.00
<b>TOTAL Money Market Fund FI</b>		<b>128,119.11</b>	<b>2.03%</b>	<b>128,119.11</b> <b>128,119.11</b>	<b>2.03%</b>	<b>128,119.11</b> <b>0.00</b>	<b>0.07%</b> <b>0.00</b>	<b>Aaa / AAA</b> <b>Aaa</b>	<b>0.00</b> <b>0.00</b>

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
<b>Negotiable CD</b>									
Sample CUSIP	Sample Issuer 1.760% Due 11/30/2018	1,500,000.00	04/21/2017 1.68%	1,501,920.00 1,500,094.69	99.95 2.31%	1,499,289.00 11,073.33	0.77% (805.69)	A1 / A+ AA-	0.08 0.08
Sample CUSIP	Sample Issuer 1.890% Due 01/10/2019	1,250,000.00	01/10/2017 1.89%	1,250,000.00 1,250,000.00	100.00 1.89%	1,250,000.00 7,481.25	0.64% 0.00	Aa2 / AA- NR	0.19 0.20
Sample CUSIP	Sample Issuer 1.880% Due 02/07/2019	1,250,000.00	02/08/2017 1.88%	1,250,000.00 1,250,000.00	99.91 2.20%	1,248,891.25 5,483.33	0.64% (1,108.75)	A1 / A+ AA-	0.27 0.27
Sample CUSIP	Sample Issuer 1.910% Due 04/05/2019	1,700,000.00	04/05/2017 1.91%	1,700,000.00 1,700,000.00	99.67 2.68%	1,694,340.70 2,435.25	0.87% (5,659.30)	Aa2 / A+ NR	0.43 0.43
Sample CUSIP	Sample Issuer 2.050% Due 05/03/2019	1,700,000.00	05/03/2017 2.05%	1,700,000.00 1,700,000.00	99.73 2.58%	1,695,486.50 17,618.61	0.88% (4,513.50)	A1 / A A	0.50 0.50
Sample CUSIP	Sample Issuer 1.840% Due 08/02/2019	1,725,000.00	08/03/2017 1.86%	1,724,327.25 1,724,746.79	99.39 2.65%	1,714,444.73 8,023.17	0.88% (10,302.06)	Aa3 / A+ AA-	0.75 0.75
Sample CUSIP	Sample Issuer 2.070% Due 09/25/2019	865,000.00	09/25/2017 2.07%	865,000.00 865,000.00	100.00 2.07%	865,000.00 1,840.29	0.44% 0.00	P-1 / A-1 F-1	0.90 0.90
<b>TOTAL Negotiable CD</b>		<b>9,990,000.00</b>	<b>1.90%</b>	<b>9,991,247.25</b> <b>9,989,841.48</b>	<b>2.39%</b>	<b>9,967,452.18</b> <b>53,955.23</b>	<b>5.12%</b> <b>(22,389.30)</b>	<b>Aa3 / A+</b> <b>AA-</b>	<b>0.44</b> <b>0.43</b>
<b>Supranational</b>									
Sample CUSIP	Sample Issuer 1.875% Due 10/07/2019	865,000.00	09/27/2017 1.60%	869,671.00 867,151.95	99.12 2.84%	857,391.46 1,081.25	0.44% (9,760.49)	Aaa / AAA AAA	0.93 0.92
Sample CUSIP	Sample Issuer 1.625% Due 05/12/2020	1,455,000.00	04/05/2017 1.70%	1,451,551.65 1,453,291.14	98.06 2.93%	1,426,822.47 11,099.43	0.73% (26,468.67)	Aaa / AAA AAA	1.53 1.48
Sample CUSIP	Sample Issuer 1.561% Due 09/12/2020	1,730,000.00	09/12/2017 1.64%	1,725,848.00 1,727,403.57	97.39 3.01%	1,684,912.74 3,675.72	0.86% (42,490.83)	Aaa / NR AAA	1.87 1.81
Sample CUSIP	Sample Issuer 2.125% Due 11/09/2020	1,700,000.00	10/02/2017 1.81%	1,715,757.48 1,710,341.72	98.33 2.98%	1,671,645.70 17,259.72	0.86% (38,696.02)	Aaa / AAA AAA	2.03 1.94
Sample CUSIP	Sample Issuer 2.250% Due 01/25/2021	2,250,000.00	Various 2.35%	2,243,535.00 2,245,184.75	98.35 3.02%	2,212,967.25 13,500.00	1.14% (32,217.50)	Aaa / AAA NR	2.24 2.15
<b>TOTAL Supranational</b>		<b>8,000,000.00</b>	<b>1.89%</b>	<b>8,006,363.13</b> <b>8,003,373.13</b>	<b>2.97%</b>	<b>7,853,739.62</b> <b>46,616.12</b>	<b>4.04%</b> <b>(149,633.51)</b>	<b>Aaa / AAA</b> <b>Aaa</b>	<b>1.84</b> <b>1.78</b>
<b>US Treasury</b>									
Sample CUSIP	US Treasury Note 1.250% Due 04/30/2019	1,700,000.00	Various 1.22%	1,701,599.45 1,700,220.41	99.39 2.48%	1,689,706.50 58.70	0.86% (10,513.91)	Aaa / AA+ AAA	0.50 0.49
Sample CUSIP	US Treasury Note 1.125% Due 05/31/2019	1,600,000.00	12/07/2016 1.22%	1,596,130.36 1,599,096.80	99.18 2.55%	1,586,937.60 7,573.77	0.81% (12,159.20)	Aaa / AA+ AAA	0.58 0.57

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	US Treasury Note 0.875% Due 07/31/2019	1,725,000.00	09/29/2015 1.19%	1,704,925.70 1,721,099.85	98.72 2.60%	1,702,966.58 3,814.45	0.87% (18,133.27)	Aaa / AA+ AAA	0.75 0.74
Sample CUSIP	US Treasury Note 1.000% Due 11/30/2019	1,750,000.00	10/29/2015 1.37%	1,724,576.18 1,743,286.20	98.16 2.73%	1,717,871.75 7,363.39	0.88% (25,414.45)	Aaa / AA+ AAA	1.08 1.06
Sample CUSIP	US Treasury Note 1.125% Due 12/31/2019	550,000.00	02/22/2016 1.11%	550,345.59 550,104.39	98.13 2.76%	539,730.40 2,084.92	0.28% (10,373.99)	Aaa / AA+ AAA	1.17 1.14
Sample CUSIP	US Treasury Note 1.250% Due 01/31/2020	1,900,000.00	Various 1.05%	1,912,256.37 1,904,686.36	98.12 2.79%	1,864,300.90 6,002.03	0.96% (40,385.46)	Aaa / AA+ AAA	1.25 1.22
Sample CUSIP	US Treasury Note 1.375% Due 02/29/2020	1,200,000.00	02/12/2016 1.06%	1,214,957.14 1,204,921.45	98.13 2.81%	1,177,593.60 2,825.97	0.60% (27,327.85)	Aaa / AA+ AAA	1.33 1.30
Sample CUSIP	US Treasury Note 1.125% Due 03/31/2020	1,200,000.00	10/11/2016 1.13%	1,199,769.65 1,199,905.96	97.66 2.82%	1,171,969.20 1,186.81	0.60% (27,936.76)	Aaa / AA+ AAA	1.42 1.39
Sample CUSIP	US Treasury Note 1.500% Due 06/15/2020	1,345,000.00	07/06/2017 1.59%	1,341,532.42 1,343,081.49	97.87 2.85%	1,316,366.30 7,662.09	0.68% (26,715.19)	Aaa / AA+ AAA	1.62 1.58
Sample CUSIP	US Treasury Note 1.375% Due 09/30/2020	2,525,000.00	Various 1.78%	2,488,516.33 2,506,257.84	97.23 2.87%	2,455,070.13 3,052.20	1.26% (51,187.71)	Aaa / AA+ AAA	1.92 1.87
Sample CUSIP	US Treasury Note 1.375% Due 10/31/2020	3,000,000.00	11/01/2017 1.76%	2,966,484.38 2,977,615.37	97.08 2.89%	2,912,460.00 113.95	1.49% (65,155.37)	Aaa / AA+ AAA	2.00 1.95
Sample CUSIP	US Treasury Note 1.125% Due 06/30/2021	4,000,000.00	Various 2.14%	3,863,681.70 3,896,143.30	95.44 2.91%	3,817,656.00 15,163.05	1.96% (78,487.30)	Aaa / AA+ AAA	2.67 2.59
Sample CUSIP	US Treasury Note 1.125% Due 09/30/2021	1,000,000.00	07/25/2017 1.78%	973,909.60 981,820.44	94.98 2.93%	949,805.00 989.01	0.49% (32,015.44)	Aaa / AA+ AAA	2.92 2.83
Sample CUSIP	US Treasury Note 2.000% Due 10/31/2021	2,000,000.00	02/02/2018 2.46%	1,967,265.63 1,973,721.31	97.32 2.94%	1,946,328.00 110.50	0.99% (27,393.31)	Aaa / AA+ AAA	3.00 2.88
Sample CUSIP	US Treasury Note 1.750% Due 11/30/2021	1,750,000.00	10/19/2017 1.88%	1,740,771.48 1,743,087.83	96.51 2.94%	1,688,886.50 12,885.93	0.87% (54,201.33)	Aaa / AA+ AAA	3.08 2.95
Sample CUSIP	US Treasury Note 1.500% Due 01/31/2022	1,800,000.00	08/15/2017 1.77%	1,779,545.09 1,785,095.16	95.52 2.96%	1,719,280.80 6,823.37	0.88% (65,814.36)	Aaa / AA+ AAA	3.25 3.12
Sample CUSIP	US Treasury Note 1.875% Due 01/31/2022	1,800,000.00	12/15/2017 2.11%	1,783,125.00 1,786,690.61	96.69 2.95%	1,740,375.00 8,529.21	0.89% (46,315.61)	Aaa / AA+ AAA	3.25 3.11
Sample CUSIP	US Treasury Note 1.875% Due 02/28/2022	3,000,000.00	Various 2.04%	2,979,453.13 2,983,862.24	96.60 2.95%	2,898,048.00 9,633.98	1.49% (85,814.24)	Aaa / AA+ AAA	3.33 3.19
Sample CUSIP	US Treasury Note 1.875% Due 03/31/2022	3,000,000.00	12/26/2017 2.20%	2,960,156.25 2,968,053.21	96.50 2.96%	2,895,000.00 4,945.05	1.48% (73,053.21)	Aaa / AA+ AAA	3.42 3.27
Sample CUSIP	US Treasury Note 1.750% Due 06/30/2022	3,500,000.00	Various 2.79%	3,364,140.63 3,374,466.58	95.81 2.96%	3,353,437.50 20,638.59	1.72% (21,029.08)	Aaa / AA+ AAA	3.67 3.49

\*Please see the disclosures on front page of this presentation.



# Holdings Report

As of September 30, 2018

## Sample Client

CUSIP	Security Description	Par Value/Units	Purchase Date Book Yield	Cost Value Book Value	Mkt Price Mkt YTM	Market Value Accrued Int.	% of Port. Gain/Loss	Moody/S&P Fitch	Maturity Duration
Sample CUSIP	US Treasury Note 1.875% Due 08/31/2022	2,800,000.00	09/18/2018 2.92%	2,691,828.13 2,694,980.95	96.04 2.98%	2,689,094.80 8,991.71	1.38% (5,886.15)	Aaa / AA+ AAA	3.84 3.65
<b>TOTAL US Treasury</b>		<b>43,145,000.00</b>	<b>1.89%</b>	<b>42,504,970.21</b> <b>42,638,197.75</b>	<b>2.86%</b>	<b>41,832,884.56</b> <b>130,448.68</b>	<b>21.44%</b> <b>(805,313.19)</b>	<b>Aaa / AA+</b> <b>Aaa</b>	<b>2.42</b> <b>2.33</b>
<b>TOTAL PORTFOLIO</b>		<b>198,239,183.53</b>	<b>1.92%</b>	<b>197,349,640.18</b> <b>197,429,509.42</b>	<b>2.90%</b>	<b>194,859,558.89</b> <b>868,070.93</b>	<b>100.00%</b> <b>(2,569,950.53)</b>	<b>Aa1 / AA</b> <b>Aaa</b>	<b>1.87</b> <b>1.69</b>
<b>TOTAL MARKET VALUE PLUS ACCRUALS</b>						<b>195,727,629.82</b>			

\*Please see the disclosures on front page of this presentation.







## Section 4 | Transactions

# Transaction Ledger

As of September 30, 2018

## Sample Client Consolidated

June 30, 2018 through September 30, 2018

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
<b>ACQUISITIONS</b>										
Purchase	08/03/2018	Sample CUSIP	3,000,000.00	Sample Issuer 2.25% Due: 11/05/2018	100.000	2.25%	3,000,000.00	187.50	3,000,187.50	0.00
Purchase	08/09/2018	Sample CUSIP	2,105,000.00	Sample Issuer 3.15% Due: 08/09/2021	99.969	3.16%	2,104,347.45	0.00	2,104,347.45	0.00
Purchase	08/28/2018	Sample CUSIP	1,750,000.00	Sample Issuer 2.5% Due: 12/09/2022	98.800	2.80%	1,729,000.00	9,600.69	1,738,600.69	0.00
Purchase	08/28/2018	Sample CUSIP	670,000.00	Sample Issuer 2.95% Due: 08/22/2022	99.986	2.98%	669,908.08	0.00	669,908.08	0.00
Purchase	09/05/2018	Sample CUSIP	2,500,000.00	Sample Issuer 2.46% Due: 02/28/2019	100.009	2.44%	2,500,227.47	1,195.83	2,501,423.30	0.00
Purchase	09/10/2018	Sample CUSIP	2,000,000.00	Sample Issuer 1.75% Due: 06/30/2022	96.219	2.80%	1,924,375.00	6,847.83	1,931,222.83	0.00
Purchase	09/11/2018	Sample CUSIP	1,500,000.00	Sample Issuer 2.4% Due: 06/07/2021	97.821	3.24%	1,467,315.00	9,400.00	1,476,715.00	0.00
Purchase	09/11/2018	Sample CUSIP	1,000,000.00	Sample Issuer 2.7% Due: 01/11/2023	97.471	3.33%	974,710.00	4,500.00	979,210.00	0.00
Purchase	09/20/2018	Sample CUSIP	2,800,000.00	Sample Issuer 1.875% Due: 08/31/2022	96.137	2.92%	2,691,828.13	2,900.55	2,694,728.68	0.00
Purchase	09/21/2018	Sample CUSIP	2,250,000.00	Sample Issuer 2.62% Due: 05/20/2019	98.246	2.69%	2,210,536.25	0.00	2,210,536.25	0.00
Purchase	09/21/2018	Sample CUSIP	750,000.00	Sample Issuer 2.38% Due: 01/22/2019	99.187	2.43%	743,901.25	0.00	743,901.25	0.00
Purchase	09/26/2018	Sample CUSIP	3,750,000.00	Sample Issuer 3.125% Due: 09/09/2022	100.420	3.01%	3,765,750.00	5,533.85	3,771,283.85	0.00
Purchase	09/30/2018	Sample CUSIP	1,600,000.00	Sample Issuer 2.375% Due: 01/19/2023	97.125	3.10%	1,554,000.00	8,022.22	1,562,022.22	0.00
Purchase	09/30/2018	Sample CUSIP	500,000.00	Sample Issuer 3.375% Due: 12/10/2021	99.952	3.39%	499,760.00	0.00	499,760.00	0.00

\*Please see the disclosures on front page of this presentation.



# Transaction Ledger

As of September 30, 2018

## Sample Client - Consolidated

June 30, 2018 through September 30, 2018

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
Purchase	09/28/2018	Sample CUSIP	650,000.00	Sample Issuer 3% Due: 10/12/2021	99.853	3.05%	649,044.50	595.83	649,640.33	0.00
<b>Subtotal</b>			<b>26,825,000.00</b>				<b>26,484,703.13</b>	<b>48,784.30</b>	<b>26,533,487.43</b>	<b>0.00</b>
<b>TOTAL ACQUISITIONS</b>			<b>26,825,000.00</b>				<b>26,484,703.13</b>	<b>48,784.30</b>	<b>26,533,487.43</b>	<b>0.00</b>
<b>DISPOSITIONS</b>										
Sale	08/08/2018	Sample CUSIP	2,100,000.00	Sample Issuer 1.1% Due: 12/05/2018	99.651	2.18%	2,092,671.00	4,042.50	2,096,713.50	-6,518.88
Sale	08/22/2018	Sample CUSIP	425,000.00	Sample Issuer 2.125% Due: 10/10/2018	99.960	2.41%	424,830.00	3,311.46	428,141.46	-273.64
Sale	08/28/2018	Sample CUSIP	1,000,000.00	Sample Issuer 1.875% Due: 11/05/2018	99.905	2.37%	999,050.00	5,885.42	1,004,935.42	-944.33
Sale	09/10/2018	Sample CUSIP	1,700,000.00	Sample Issuer 1.25% Due: 01/31/2019	99.605	2.27%	1,693,292.97	2,367.53	1,695,660.50	-7,225.33
Sale	09/11/2018	Sample CUSIP	1,635,000.00	Sample Issuer 2.35% Due: 01/28/2019	99.965	2.44%	1,634,427.75	4,589.35	1,639,017.10	-3,711.27
Sale	09/11/2018	Sample CUSIP	1,000,000.00	Sample Issuer 1.7% Due: 01/09/2019	99.773	2.39%	997,730.00	2,927.78	1,000,657.78	-2,515.27
Sale	09/20/2018	Sample CUSIP	2,000,000.00	Sample Issuer 2.65% Due: 04/01/2019	100.039	2.57%	2,000,780.00	24,880.56	2,025,660.56	-980.54
Sale	09/26/2018	Sample CUSIP	2,000,000.00	Sample Issuer 1.25% Due: 01/16/2019	99.673	2.32%	1,993,460.00	4,861.11	1,998,321.11	-6,528.35
Sale	09/26/2018	Sample CUSIP	1,765,000.00	Sample Issuer 1.125% Due: 12/14/2018	99.756	2.25%	1,760,693.40	5,625.94	1,766,319.34	-4,123.88
<b>Subtotal</b>			<b>13,625,000.00</b>				<b>13,596,935.12</b>	<b>58,491.65</b>	<b>13,655,426.77</b>	<b>-32,821.49</b>
Maturity	08/01/2018	Sample CUSIP	500,000.00	Sample Issuer 2.1% Due: 08/01/2018	100.000		500,000.00	0.00	500,000.00	0.00

\*Please see the disclosures on front page of this presentation.



# Transaction Ledger

As of September 30, 2018

## Sample Client - Consolidated

June 30, 2018 through September 30, 2018

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
Maturity	08/07/2018	Sample CUSIP	1,350,000.00	Sample Issuer 0.625% Due: 08/07/2018	100.000		1,350,000.00	0.00	1,350,000.00	0.00
Maturity	08/10/2018	Sample CUSIP	3,000,000.00	Sample Issuer 1.87% Due: 08/10/2018	98.940		2,968,210.00	31,790.00	3,000,000.00	0.00
Maturity	08/13/2018	Sample CUSIP	2,100,000.00	Sample Issuer 2.01% Due: 08/13/2018	98.989		2,078,777.75	21,222.25	2,100,000.00	0.00
Maturity	08/15/2018	Sample CUSIP	500,000.00	Sample Issuer 1.15% Due: 08/15/2018	100.000		500,000.00	0.00	500,000.00	0.00
Maturity	08/15/2018	Sample CUSIP	400,000.00	Sample Issuer 1% Due: 08/15/2018	100.000		400,000.00	0.00	400,000.00	0.00
Maturity	08/24/2018	Sample CUSIP	2,750,000.00	Sample Issuer 1.6% Due: 08/24/2018	100.000		2,750,000.00	48,400.00	2,798,400.00	0.00
Maturity	09/04/2018	Sample CUSIP	2,000,000.00	Sample Issuer 1.75% Due: 09/04/2018	100.000		2,000,000.00	0.00	2,000,000.00	0.00
Maturity	09/04/2018	Sample CUSIP	500,000.00	Sample Issuer 2.34% Due: 09/04/2018	99.194		495,970.00	4,030.00	500,000.00	0.00
Maturity	09/21/2018	Sample CUSIP	2,000,000.00	Sample Issuer 1.45% Due: 09/21/2018	100.000		2,000,000.00	0.00	2,000,000.00	0.00
Maturity	09/21/2018	Sample CUSIP	1,000,000.00	Sample Issuer 2.31% Due: 09/21/2018	99.211		992,107.50	7,892.50	1,000,000.00	0.00
Maturity	09/25/2018	Sample CUSIP	1,970,000.00	Sample Issuer 1% Due: 10/05/2018	100.000		1,970,000.00	0.00	1,970,000.00	0.00
Maturity	09/25/2018	Sample CUSIP	1,000,000.00	Sample Issuer 2.32% Due: 10/05/2018	99.265		992,653.33	7,346.67	1,000,000.00	0.00
Maturity	09/25/2018	Sample CUSIP	2,100,000.00	Sample Issuer 2.37% Due: 10/09/2018	98.808		2,074,976.75	25,023.25	2,100,000.00	0.00
Maturity	09/27/2018	Sample CUSIP	1,500,000.00	Sample Issuer 2.25% Due: 10/10/2018	99.444		1,491,656.25	8,343.75	1,500,000.00	0.00
Maturity	09/27/2018	Sample CUSIP	1,000,000.00	Sample Issuer 2.23% Due: 10/16/2018	99.443		994,425.00	5,575.00	1,000,000.00	0.00
Maturity	09/27/2018	Sample CUSIP	2,700,000.00	Sample Issuer 1.71% Due: 10/19/2018	100.000		2,700,000.00	46,683.00	2,746,683.00	0.00

\*Please see the disclosures on front page of this presentation.



# Transaction Ledger

As of September 30, 2018

## Sample Client - Consolidated

June 30, 2018 through September 30, 2018

Transaction Type	Settlement Date	CUSIP	Quantity	Security Description	Price	Acq/Disp Yield	Amount	Interest Pur/Sold	Total Amount	Gain/Loss
Maturity	09/28/2018	Sample CUSIP	300,000.00	Sample Issuer 2.17% Due: 10/24/2018	99.451		298,354.42	1,645.58	300,000.00	0.00
Maturity	09/29/2018	Sample CUSIP	1,500,000.00	Sample Issuer 2.26% Due: 10/29/2018	100.000		1,500,000.00	9,605.00	1,509,605.00	0.00
<b>Subtotal</b>			<b>28,170,000.00</b>				<b>28,057,131.00</b>	<b>217,557.00</b>	<b>28,274,688.00</b>	<b>0.00</b>
<b>TOTAL DISPOSITIONS</b>			<b>41,795,000.00</b>				<b>41,654,066.12</b>	<b>276,048.65</b>	<b>41,930,114.77</b>	<b>-32,821.49</b>

\*Please see the disclosures on front page of this presentation.





## Section 6 | Disclosures



# Important Disclosures

*As of September 30, 2018*

2020 Chandler Asset Management, Inc, An Independent Registered Investment Adviser.

Information contained herein is confidential. Prices are provided by IDC, an independent pricing source. In the event IDC does not provide a price or if the price provided is not reflective of fair market value, Chandler will obtain pricing from an alternative approved third party pricing source in accordance with our written valuation policy and procedures. Our valuation procedures are also disclosed in Item 5 of our Form ADV Part 2A.

Performance results are presented gross-of-advisory fees and represent the client's Total Return. The deduction of advisory fees lowers performance results. These results include the reinvestment of dividends and other earnings. Past performance may not be indicative of future results. Therefore, clients should not assume that future performance of any specific investment or investment strategy will be profitable or equal to past performance levels. All investment strategies have the potential for profit or loss. Economic factors, market conditions or changes in investment strategies, contributions or withdrawals may materially alter the performance and results of your portfolio.

Index returns assume reinvestment of all distributions. Historical performance results for investment indexes generally do not reflect the deduction of transaction and/or custodial charges or the deduction of an investment management fee, the incurrence of which would have the effect of decreasing historical performance results. It is not possible to invest directly in an index.

Source ice Data Indices, LLC ("ICE"), used with permission. ICE permits use of the ICE indices and related data on an "as is" basis; ICE, its affiliates and their respective third party suppliers disclaim any and all warranties and representations, express and/or implied, including any warranties of merchantability or fitness for a particular purpose or use, including the indices, index data and any data included in, related to, or derived therefrom. Neither ICE data, its affiliates or their respective third party providers guarantee the quality, adequacy, accuracy, timeliness or completeness of the indices or the index data or any component thereof, and the indices and index data and all components thereof are provided on an "as is" basis and licensee's use it at licensee's own risk. ICE data, its affiliates and their respective third party do not sponsor, endorse, or recommend chandler asset management, or any of its products or services.

This report is provided for informational purposes only and should not be construed as a specific investment or legal advice. The information contained herein was obtained from sources believed to be reliable as of the date of publication, but may become outdated or superseded at any time without notice. Any opinions or views expressed are based on current market conditions and are subject to change. This report may contain forecasts and forward-looking statements which are inherently limited and should not be relied upon as indicator of future results. Past performance is not indicative of future results. This report is not intended to constitute an offer, solicitation, recommendation or advice regarding any securities or investment strategy and should not be regarded by recipients as a substitute for the exercise of their own judgment.

Fixed income investments are subject to interest, credit and market risk. Interest rate risk: the value of fixed income investments will decline as interest rates rise. Credit risk: the possibility that the borrower may not be able to repay interest and principal. Low rated bonds generally have to pay higher interest rates to attract investors willing to take on greater risk. Market risk: the bond market in general could decline due to economic conditions, especially during periods of rising interest rates.

Ratings information have been provided by Moody's, S&P and Fitch through data feeds we believe to be reliable as of the date of this statement, however we cannot guarantee its accuracy.

Security level ratings for U.S. Agency issued mortgage-backed securities ("MBS") reflect the issuer rating because the securities themselves are not rated. The issuing U.S. Agency guarantees the full and timely payment of both principal and interest and carries a AA+/Aaa/AAA by S&P, Moody's and Fitch respectively.

S&P/Case Shiller U.S. National Home Price Index tracks the value of single-family housing within the United States. The S&P Case Shiller 20 City Composite Home Price Index is a value-weighted average of the 20 metro area indices. These metro areas include: Boston, Chicago, Denver, Las Vegas, Los Angeles, Miami, New York City, San Diego, San Francisco, Washington, DC, Atlanta, Charlotte, Cleveland, Dallas, Detroit, Minneapolis, Phoenix, Portland, Seattle and Tampa.

*\*Please see the disclosures on front page of this presentation.*



## **ICE BAML 1-3 Yr US Treasury Index**

*The ICE BAML 1-3 Year US Treasury Index tracks the performance of US dollar denominated sovereign debt publicly issued by the US government in its domestic market. Qualifying securities must have at least one year remaining term to final maturity and less than three years remaining term to final maturity, a fixed coupon schedule and a minimum amount outstanding of \$1 billion. Qualifying securities must have at least 18 months to final maturity at the time of issuance. (Index: G1O2. Please visit [www.mlindex.ml.com](http://www.mlindex.ml.com) for more information)*

## **ICE BAML 1-3 Yr US Corp/Govt Rated AAA-A Index**

*The ICE BAML 1-3 AAA-A Year US Corporate & Government Index tracks the performance of US dollar denominated investment grade debt publicly issued in the US domestic market, including US Treasury, US agency, foreign government, supranational and corporate securities. Qualifying securities must be rated AAA through A3 (based on an average of Moody's, S&P and Fitch). In addition, qualifying securities must have at least one year remaining term to final maturity and less than three years remaining term to final maturity, at least 18 months to final maturity at point of issuance, a fixed coupon schedule and a minimum amount outstanding of \$1 billion for US Treasuries and \$250 million for all other securities. (Index: GVPB. Please visit [www.mlindex.ml.com](http://www.mlindex.ml.com) for more information)*





## Portfolio Characteristics

Market Value	25,924,396
Avg Modified Duration	2.34
Avg Maturity	2.45

## Interest Rate Shock Analysis

Fair value of portfolio after increase of:	
100 bps	-606,063
200 bps	-1,212,125
300 bps	-1,818,188

## Sector Characteristics

## Segmented Time Distribution

Sector	Market Value	Avg Mod. Duration	Avg Maturity	% of Port	<1 YR	1-3 YRS	3-5 YRS	>5 YRS
US Treasury	12,136,878	2.16	2.24	46.82%	2,534,555	5,580,662	4,021,661	0
Agency	9,018,469	2.62	2.76	34.79%	1,169,287	4,318,551	3,530,631	0
US Corporate	4,352,762	2.27	2.42	16.79%	1,147,920	1,591,340	1,613,502	0
Foreign Corporate	339,545	2.82	3.02	1.31%	0	0	339,545	0
Money Market Fund FI	76,742	0.00	0.00	0.30%	76,742	0	0	0
<b>TOTAL</b>	<b>25,924,396</b>	<b>2.34</b>	<b>2.45</b>	<b>100.00%</b>	<b>4,928,504</b>	<b>11,490,553</b>	<b>9,505,338</b>	<b>0</b>

## Concentration of Credit

Issuer Name	Cost	Market Value	Avg Mod. Duration	Avg Maturity	% of Port
Sample Issuer	12,255,514	12,136,878	2.16	2.24	46.82%
Sample Issuer	4,195,470	4,169,623	2.63	2.77	16.08%
Sample Issuer	3,236,631	3,195,445	2.92	3.09	12.33%
Sample Issuer	1,670,908	1,653,401	2.04	2.13	6.38%
Sample Issuer	501,170	499,297	0.17	0.16	1.93%
Sample Issuer	345,093	339,545	2.82	3.02	1.31%
Sample Issuer	325,628	328,349	4.06	4.49	1.27%
Sample Issuer	325,497	326,062	4.18	4.61	1.26%

Please note: This sample client service report is being provided for illustrative purposes to demonstrate Chandler Asset Management's reporting capabilities. References to specific securities and their characteristics are examples of securities held in the portfolio and are not intended to be, and should not be interpreted as an offer, solicitation or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio. The information contained in this sample presentation is subject to change and obtained from sources we believe to be reliable, but we do not guarantee its accuracy. Portfolio characteristics are based on a sample portfolio managed by Chandler. There is no guarantee that investment in any of these characteristics will result in characteristics similar to those that appear herein due to economic conditions and other market factors, which will fluctuate. Past performance is not indicative of future success. Fixed income investments are subject to interest, credit and market risk.



## Concentration of Credit

Issuer Name	Cost	Market Value	Avg Mod. Duration	Avg Maturity	% of Port
Sample Issuer	323,219	320,691	1.97	2.06	1.24%
Sample Issuer	325,575	320,321	2.08	2.17	1.24%
Sample Issuer	323,258	319,453	3.75	4.07	1.23%
Sample Issuer	323,096	318,726	2.29	2.38	1.23%
Sample Issuer	318,926	315,875	2.30	2.38	1.22%
Sample Issuer	324,373	315,727	2.51	2.61	1.22%
Sample Issuer	313,060	315,383	3.76	4.04	1.22%
Sample Issuer	76,742	76,742	0.00	0.00	0.30%
<b>TOTAL</b>	<b>26,169,765</b>	<b>25,924,396</b>	<b>2.34</b>	<b>2.45</b>	<b>100.00%</b>

## CUSIP Details

CUSIP	Issue Name	Issue	Cpn	Maturity Date	Is Callable	Next Call Date	Market Value	Duration	Market Term	Ratings Moody/SP/Fitch		
Sample CUSIP	Sample Issuer	Government MMKT Fund #657	2.00	12/31/2018	N		76,742	0.00	0.00	Aaa	AAA	NR
Sample CUSIP	Sample Issuer	Note	1.50	02/28/2019	N		399,428	0.16	0.16	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	2.13	03/01/2019	N		499,297	0.17	0.16	A1	AA-	NR
Sample CUSIP	Sample Issuer	Note	1.95	03/04/2019	N		324,362	0.17	0.17	A2	A	A
Sample CUSIP	Sample Issuer	Note	1.95	03/15/2019	N		324,262	0.20	0.20	A2	AA-	A
Sample CUSIP	Sample Issuer	Note	1.63	04/30/2019	N		797,750	0.33	0.33	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.75	05/30/2019	N		498,415	0.41	0.41	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.63	08/31/2019	N		347,689	0.65	0.67	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.75	09/12/2019	N		670,872	0.68	0.70	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.50	11/30/2019	N		989,688	0.90	0.92	Aaa	AA+	AAA

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## CUSIP Details

CUSIP	Issue Name	Issue	Cpn	Maturity Date	Is Callable	Next Call Date	Market Value	Duration	Market Term	Ratings Moody/SP/Fitch		
Sample CUSIP	Sample Issuer	Note	1.75	06/30/2022	N		487,891	3.37	3.50	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.88	08/31/2022	N		587,156	3.49	3.67	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.75	09/30/2022	N		1,022,274	3.58	3.75	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	2.00	10/05/2022	N		490,548	3.58	3.76	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.88	10/31/2022	N		366,621	3.66	3.84	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Callable Note Cont 12/13/2022	2.40	01/13/2023	Y	12/13/2022	315,383	3.76	4.04	Aa1	AA+	NR
Sample CUSIP	Sample Issuer	Note	2.38	01/19/2023	N		719,574	3.79	4.05	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Callable Note Cont 12/23/22	2.85	01/23/2023	Y	12/23/2022	319,453	3.75	4.07	A1	AA-	AA-
Sample CUSIP	Sample Issuer	Note	2.13	03/10/2023	N		244,877	3.95	4.19	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	3.25	06/09/2023	N		307,603	4.11	4.44	Aaa	AA+	NR
Sample CUSIP	Sample Issuer	Note	2.75	06/19/2023	N		301,753	4.18	4.47	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Callable Note Cont 5/26/2023	3.40	06/26/2023	Y	05/26/2023	328,349	4.06	4.49	Aa2	AA	AA
Sample CUSIP	Sample Issuer	Note	3.45	08/11/2023	N		326,062	4.18	4.61	A1	A	AA-
Sample CUSIP	Sample Issuer	Note	3.38	09/08/2023	N		412,006	4.28	4.69	Aaa	AA+	NR
Sample CUSIP	Sample Issuer	Note	2.88	09/12/2023	N		384,474	4.34	4.70	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	1.63	10/31/2023	N		479,903	4.59	4.84	Aaa	AA+	AAA
Sample CUSIP	Sample Issuer	Note	3.38	12/08/2023	N		128,819	4.52	4.94	Aaa	AA+	AAA
<b>TOTAL</b>							<b>25,924,396</b>					

Please note: This sample client service report is being provided for illustrative purposes to demonstrate Chandler Asset Management's reporting capabilities. References to specific securities and their characteristics are examples of securities held in the portfolio and are not intended to be, and should not be interpreted as an offer, solicitation or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio. The information contained in this sample presentation is subject to change and obtained from sources we believe to be reliable, but we do not guarantee its accuracy. Portfolio characteristics are based on a sample portfolio managed by Chandler. There is no guarantee that investment in any of these characteristics will result in characteristics similar to those that appear herein due to economic conditions and other market factors, which will fluctuate. Past performance is not indicative of future success. Fixed income investments are subject to interest, credit and market risk.

## Sample GASB 72 - Fair Value Measurements

As of December 31, 2018



Asset	Fair Value	Investments That Are Not Measured at Fair Value	Quoted Prices in Active Markets for Identical Assets (Level 1)	Significant Other Observable Inputs (Level 2)	Significant Unobservable Inputs (Level 3)
Agency	\$9,018,469.17	\$0.00	\$0.00	\$9,018,469.17	\$0.00
Foreign Corporate	\$339,544.80	\$0.00	\$0.00	\$339,544.80	\$0.00
Money Market Fund FI	\$76,742.02	\$76,742.02	\$0.00	\$0.00	\$0.00
US Corporate	\$4,352,761.72	\$0.00	\$0.00	\$4,352,761.72	\$0.00
US Treasury	\$12,136,877.85	\$0.00	\$0.00	\$12,136,877.85	\$0.00
<b>TOTAL PORTFOLIO</b>	<b>\$25,924,395.56</b>	<b>\$76,742.02</b>	<b>\$0.00</b>	<b>\$25,847,653.54</b>	<b>\$0.00</b>

*Please note: This sample client service report is being provided for illustrative purposes to demonstrate Chandler Asset Management's reporting capabilities. References to specific securities and their characteristics are examples of securities held in the portfolio and are not intended to be, and should not be interpreted as an offer, solicitation or recommendation to purchase or sell any financial instrument, an indication that the purchase of such securities was or will be profitable, or representative of the composition or performance of the portfolio. Portfolio characteristics and asset allocation are based on a sample portfolio managed by Chandler. There is no guarantee that investment in any of these characteristics will result in characteristics similar to those that appear herein due to economic conditions and other market factors, which will fluctuate. The information contained in this sample presentation is subject to change and obtained from sources we believe to be reliable, but we do not guarantee its accuracy. Past performance is not indicative of future success. Fixed income investments are subject to interest, credit and market risk.*



## **Appendix H**

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### **Sample Investment Management Agreement**

## INVESTMENT MANAGEMENT AGREEMENT (Non-Discretionary)

\_\_\_\_\_ (Client) hereby retains Chandler Asset Management, Inc. (Chandler) as Investment Adviser on the terms and conditions set forth herein.

1. Term. The term of this Agreement shall commence upon the execution of this Agreement and shall continue until this Agreement is terminated effective upon receipt of notice of termination in writing delivered by the terminating party.
2. Fees. Client shall compensate Chandler monthly an amount calculated on the average market value of Client's portfolio, including accrued interest, in accordance with the following schedule:

Assets Under Management	Annual Investment Management Fee
First \$X million	0.00 of 1% (0 basis points)
Next \$ X million	0.00 of 1% (0 basis points)
Assets in excess of \$X million	0.00 of 1% (0 basis points)

The fees expressed above do not include any custody fees that may be charged by Client's bank or other third party custodian.

Fees shall be prorated to the effective date of termination on the basis of actual days elapsed, and any unearned portion of prepaid fees shall be refunded. Client is not required to pay any start-up or closing fees; there are no penalty fees.

Fees shall be deducted monthly in arrears from Client's custody account.

3. Client Representative. In its capacity as investment manager, Chandler shall receive all instructions, directions and other communications on Client's behalf respecting Client's account from \_\_\_\_\_ (Representative). Chandler is hereby authorized to rely and act upon all such instructions, directions and communications from such Representative or any agent of such Representative.
4. Investment Policy. In investing and reinvesting Client's assets, Chandler shall comply with Client's Investment Policy, which is attached hereto as Exhibit A.
5. Authority of Chandler. Chandler is hereby granted authority to invest and reinvest all assets under its management in securities permitted by the Investment Policy, subject to the prior approval of Representative. Such approval may be granted orally, by facsimile, or by email.
6. Notices. All reports and other communications required hereunder to be in writing shall be delivered in person, or sent by first-class mail postage prepaid, by overnight courier, by confirmed facsimile with original to follow or by confirmed electronic mail with proof of receipt to the addresses set forth

below. Either party to this Agreement may, by written notice given at any time, designate a different address for the receipt of reports and other communications due hereunder.

Chandler Asset Management  
Attn: Nicole Dragoo  
6225 Lusk Boulevard  
San Diego, CA 92121

Client Representative

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Electronic Delivery. From time to time, Chandler may be required to deliver certain documents to Client such as account information, notices and required disclosures. Client hereby consents to Chandler's use of electronic means, such as email, to make such delivery. This delivery may include notification of the availability of such document(s) on a website, and Client agrees that such notification will constitute "delivery". Client further agrees to provide Chandler with Client's email address(s) and to keep this information current at all times by promptly notifying Chandler of any change in email address(s).

Client email address: \_\_\_\_\_

8. Proxy Voting. Chandler will vote proxies on behalf of client unless otherwise instructed. Chandler has adopted and implemented written policies and procedures and will provide client with a description of the proxy voting procedures upon request. Chandler will provide information regarding how clients' proxies were voted upon request. To request proxy policies or other information, please contact us by mail at the address provided, by calling 800-317-4747 or by emailing your request to [info@chandlerasset.com](mailto:info@chandlerasset.com).
9. Custody of Securities and Funds. Chandler shall not have custody or possession of the funds or securities that Client has placed under its management. Client shall appoint a custodian to take and have possession of its assets. Client recognizes that the fees expressed above do not include fees Client will incur for custodial services.
10. Valuation. Chandler will value securities held in portfolios managed by Chandler no less than monthly. Securities or investments in the portfolio will be valued in a manner determined in good faith by Chandler to reflect fair market value.
11. Investment Advice. Client recognizes that the opinions, recommendations and actions of Chandler will be based on information deemed by it to be reliable, but not guaranteed to or by it. Provided that Chandler acts in good faith, Client agrees that Chandler will not in any way be liable for any error in judgment or for any act or omission, except as may otherwise be provided for under the Federal Securities laws or other applicable laws.
12. Payment of Commissions. Chandler may place buy and sell orders with or through such brokers or dealers as it may select. It is the policy and practice of Chandler to strive for the best price and execution and for commission and discounts which are competitive in relation to the value of the transaction and which comply with Section 28(e) of the Securities and Exchange Act. Nevertheless, it is understood that Chandler may pay a commission on transactions in excess of the amount another

broker or dealer may charge, and that Chandler makes no warranty or representation regarding commissions paid on transactions hereunder.

13. Other Clients. It is further understood that Chandler may be acting in a similar capacity for other institutional and individual clients, and that investments and reinvestments for client's portfolio may differ from those made or recommended with respect to other accounts and clients even though the investment objectives may be the same or similar. Accordingly, it is agreed that Chandler will have no obligation to purchase or sell for Client's account any securities which it may purchase or sell for other clients.
14. Confidential Relationship. The terms and conditions of this Agreement, and all information and advice furnished by either party to the other shall be treated as confidential and shall not be disclosed to third parties except (i) as required by law, rule, or regulation, (ii) as requested by a regulatory authority, (iii) for disclosures by either party of information that has become public by means other than wrongful conduct by such party or its officers, employees, or other personnel, (iv) for disclosures by either party to its legal counsel, accountants, or other professional advisers, (v) as necessary for Chandler to carry out its responsibilities hereunder, or (vi) as otherwise expressly agreed by the parties.
15. No Assignment & Amendments. Neither party may assign, directly or indirectly, all or part of its rights or obligations under this Agreement without the prior written consent of the other party, which consent shall not be unreasonably withheld or delayed. This Agreement may be amended at any time by mutual agreement in writing.
16. Governing Law. It is understood that this Agreement shall be governed by and construed under and in accordance with the laws of the State of California.
17. Severability. Any provision of this Agreement which is prohibited or unenforceable shall be ineffective only to the extent of such prohibition or unenforceability without invalidating the remaining provisions hereof.
18. Receipt of Brochure and Privacy Policy. Client hereby acknowledges receipt of the disclosure statement or "brochure" and "brochure supplement" also known as Part 2A and Part 2B of Form ADV, required to be delivered pursuant to Rule 204-3 of the Investment Advisers Act of 1940 (Brochure). Client further acknowledges receipt of Chandler's Privacy Policy, as required by Regulation S-P.
19. Arbitration. It is agreed that any controversy between Chandler and the Client arising out of Chandler business or this Agreement, shall be submitted to arbitration conducted under the provisions of the commercial arbitration rules of the American Arbitration Association. Arbitration must be commenced by service upon the other party of a written demand for arbitration or a written notice of intention to arbitrate, therein electing the arbitration tribunal. In the event the Client does not make such election within five (5) days of such demand or notice, then the Client authorizes Chandler to do so on the Client's behalf. Judgment upon any award rendered by the arbitrators shall be final and may be entered in any court having jurisdiction thereof. This clause does not constitute a



waiver of any right including the right to choose the forum, whether arbitration or adjudication, in which to seek resolution of disputes.

Client

By: \_\_\_\_\_  
Date

Chandler Asset Management, Inc.,  
a California Corporation

By: \_\_\_\_\_  
Martin Cassell, CFA  
CEO/Chief Investment Officer  
Date