City of Carson 457(b) and 401(a) Plans Investment Policy Statement

Part I. THE PLAN

The Company sponsors a defined contribution plan (the "Plan") for the benefit of its employees and their designated beneficiaries. The Company will appoint a Committee to serve as the Plan fiduciary. The Plan is intended to provide participating employees long-term accumulation of savings through contributions to individual participant accounts and the earnings thereon.

The Plan is a qualified employee benefit plan intended to comply with all applicable federal laws and regulations, including section 401(a) of the Internal Revenue Code of 1986, as amended, and the Employee Retirement Income Security Act of 1974 (ERISA), as amended. In addition, the Plan is intended to comply with ERISA Section 404(c).

The Plan's participants and beneficiaries are expected to have different investment objectives, time horizons and risk tolerances. To meet these varying investment needs, participants and beneficiaries will be able to direct their account balances among a range of investment options to construct diversified portfolios that reasonably span the risk/return spectrum. Participants and beneficiaries alone bear the risk of investment results from the options and their asset allocation.

Part II. THE PURPOSE OF THE INVESTMENT POLICY STATEMENT

This Investment Policy Statement ("IPS") is intended to assist the Plan's fiduciaries by establishing guidelines for making investment-related decisions in a prudent manner. These guidelines are not intended to mandate action by the fiduciaries, and the Plan's fiduciaries are expected to exercise their discretion in managing the Plan's investments. The IPS outlines the underlying philosophies and processes for the selection, monitoring and evaluation of the investment options offered by the Plan.

Specifically, this Investment Policy Statement:

- Defines the Plan's investment objectives.
- Defines the roles of those responsible for the Plan's investments.
- Describes the criteria and procedures for selecting the investment options.
- Establishes investment procedures, measurement standards and monitoring procedures.
- Describes corrective actions the committee can take should investment options and investment managers fail to satisfy established objectives.
- Describes the types of educational materials to be provided to Plan participants and beneficiaries.
- Describes ways to comply with fiduciary obligations and applicable laws and regulations.

This Investment Policy Statement will be reviewed periodically, and, if appropriate, may be amended to reflect changes in the capital markets, plan objectives, or other factors relevant to the Plan.

This Investment Policy Statement (including the criteria for the selection and monitoring of investment options under the Plan) does not apply to employer securities (also known as Company stock) if offered under the Plan.

Part III. INVESTMENT OBJECTIVES

The Committee will select the Plan's investment options based on criteria deemed relevant, from time to time, by the Committee. These criteria may include, but are not limited to, the following:

- Maximization of return within reasonable and prudent levels of risk.
- Provision of returns comparable to returns for similar investment options.
- Provision of exposure to a wide range of investment opportunities in various asset classes and vehicles.
- Control administrative and management costs.
- Provision of appropriate diversification within investment vehicles.
- Investment manager's adherence to stated investment objectives and style.

EXHIBIT NO. 0 3



Part IV. ROLES AND RESPONSIBILITIES

Subject to the terms of the Plan document, the Committee is responsible for selecting the investment options(s), and selecting an investment(s) for default(s) when a participant or beneficiary fails to provide investment direction. The Committee is also responsible for:

- Establishing and maintaining the Investment Policy Statement.
- Periodically evaluating the Plan's investment performance and recommending investment option changes.
- · Periodically monitoring the service providers and investment consultant.
- Periodically monitoring Plan costs.
- Providing for Plan participant investment education and communication.

Part V. SELECTION OF INVESTMENT OPTIONS

The selection of investment options offered under the Plan is among the Committee's most important responsibilities. Set forth below are the considerations and guidelines employed in fulfilling this fiduciary responsibility.

The Plan intends to provide an appropriate range of investment options that may span the risk/return spectrum. Further, the Plan's investment options are intended to allow Plan participants to construct portfolios consistent with their unique individual circumstances, goals, time horizons and tolerance for risk. Major asset classes to be considered may include, but are not limited to:

Conservative Investments

Cash and liquid investments including, but not limited to, money market, stable value, and guaranteed interest accounts.

Income Investments

Income oriented investments including, but not limited to, low, medium, and high quality bond funds, with short, intermediate, and/or long term duration. Management styles may be indexed and actively managed international, global, and domestic styles.

Equity Investments

Funds that invest in equity securities, both domestic and foreign, including, but not limited to, small, medium, and large market capitalization, with value, blend, and growth investment objectives, which may be actively managed or indexed.

Asset Allocation Investments

Funds or accounts that invest in a combination of conservative, income, and equity investments, "fund of funds" accounts combining several of the above investments into one or a series of investments, and "manager of managers" accounts combining several different investment styles and fund managers into one account or a series of accounts.

Other Investments

Other appropriate investments in other styles or asset classes offered through vehicles such as commingled trusts, insurance company separate accounts through a group annuity contract, and mutual funds. Notwithstanding the foregoing, the Committee may consider, but is not required, to include in the investment menu any specific investment asset class, option, or style.

Default Investment(s)

The Investment Committee will evaluate and choose an investment or set of investments to serve as the default investment(s) for the Plan. The default investment(s) will be the designated investment for dollars contributed to the Plan by participants and/or the employer for which the Plan has not received investment direction.

The default investment will be selected to comply with the requirements of ERISA section 404(c)(5) and the regulations promulgated thereunder as a qualified default investment alternative ("QDIA").

After determining the desired asset classes, the Committee will evaluate and choose the desired investment option(s) for the Plan's investment menu. If an investment manager (responsible for the management of the underlying investment



vehicle, such as a mutual fund, commingled account or separate account) is chosen as the investment option, the following minimum criteria should be considered:

- 1. The investment manager should be a bank, insurance company, investment management, mutual fund company or an investment advisor under the Investment Advisers Act of 1940;
- 2. The investment manager should operate in good standing with regulators and clients, with no material pending or concluded legal actions against it; and
- 3. All relevant quantitative and qualitative information on the fund manager and fund should be made available by the manager and/or vendor.

In addition to the minimum criteria above, all investments under consideration should meet the following standards for selection:

- Investment performance should be competitive with an appropriate style-specific benchmark and the median
 return for an appropriate, style-specific peer group (where appropriate and available, long-term performance of
 an investment manager may be inferred through the performance of another investment with similar style
 attributes managed by such investment manager);
- 2. Specific risk and risk-adjusted return measures should be reviewed by the Committee and be within a reasonable range relative to appropriate, style-specific benchmark and peer group;
- 3. The investment manager should demonstrate adherence to the stated investment objective, without excess style drift over trailing performance periods;
- 4. Fees and fee structures should be competitive compared with similar investments reasonably available to the Plan;
- 5. The investment manager should exhibit attractive qualitative characteristics, including, but not limited to, acceptable manager tenure; and
- 6. The investment manager should be able to provide performance, holdings, and other relevant information in a timely fashion with specified frequency.

Furthermore, investment managers (to be used interchangeably with the term "fund" throughout the Investment Policy Statement) will be evaluated and selected utilizing an investment manager "score card," detailed in Part VII (Investment Monitoring and Reporting).

Finally, any fiduciary warranty or guarantee offered by the service provider will be considered in the investment selection process, but will not supersede the provisions of this Investment Policy Statement.

Part VI. INVESTMENT MONITORING AND REPORTING

The ongoing monitoring of investments is a regular and disciplined process. Monitoring confirms that the criteria remain satisfied and that an investment option continues to be appropriate. The process of monitoring investment performance relative to specified guidelines will be consistently applied. Frequent change of investments is neither expected nor desired.

The Committee will bear in mind any and all political, social, economic or other changes that may potentially require more frequent review and consideration of investments. The following are some, but not all, general factors that may be considered in ongoing monitoring:

- Current regulatory environment,
- · Current state of capital markets,
- Performance of investment alternatives.
- Assessment of costs and treatment of revenue sharing
- The prudent applicability of this Investment Policy Statement as written, in light of prevailing facts and circumstances.

Monitoring will utilize the same investment selection criteria used in the original selection analysis. Unusual, notable, or extraordinary events will be communicated by the investment manager and/or vendor on a timely basis to the Committee. Examples of such events include portfolio manager or team departure, violation of investment guidelines,



material litigation against the investment management firm, or material changes in firm ownership structure and announcements thereof.

If overall satisfaction with the investment option is acceptable, no further action is required. If areas of dissatisfaction exist, the investment manager must take steps to remedy the deficiency. If over a reasonable period the manager is unable to resolve the issue, removal of the investment option may result.

For supported asset classes, an investment manager "score card" will be maintained and documented (see addendum) to substantiate acceptable levels of manager performance and appropriate style characteristics. Based upon objective criteria, derived from Modern Portfolio Theory concepts, each fund will receive a score reflecting its overall performance.

If a fund fails to meet the criteria standards, as determined by its score, it will be placed on a "watch list." (In the event a fund receives a score which is below that of "watch list" status, or experiences extraordinary circumstances which may render it inappropriate to maintain, it may be considered for removal at the earliest administratively reasonable date.) If this fund continues to remain on "watch list" for the following three quarters, or four of the following seven quarters, the fund should be considered for possible removal.

If the fund meets criteria standards for four consecutive quarters, it may be removed from the watch list.

Asset Allocation funds and/or accounts (risk-based or age-based) will be scored and monitored using the previously described guidelines. Unlike other funds which are monitored and scored individually, these funds should be evaluated as a group. Due to the unique importance of these professionally managed and diversified vehicles for participants in the plan, funds or accounts failing to achieve criteria standards will be carefully reviewed before removal from the plan (in the absence of a reasonable alternative). In addition, funds with short time history should be evaluated qualitatively.

Target-Date (age-based) funds or accounts will have strategies that allow the funds or accounts to grow more conservative over time until a certain retirement date or life expectancy date. This roll down process is commonly referred to as a "glide path". The glide path associated with a set of target-date funds should be reviewed to make sure it is appropriate, and continues to be appropriate, for the Plan and Plan's participants.

Investments where no score is applied due to specialty focus, short time history or other unique circumstances should be reviewed using a qualitative framework.

The foregoing investment monitoring criteria (including the investment manager "score card") shall not, under any circumstances, be taken as definitive, conclusive, or controlling for removal, termination, or continuation of an investment option. All determinations should be made by the Committee, in its sole discretion, taking into consideration all relevant facts and circumstances.

The Committee retains full responsibility for the offering and monitoring of any self-directed brokerage account(s) and/or company stock offered as an investment option, which will be reviewed periodically as determined by the Committee based on criteria determined by the Committee based on criteria determined by the Committee. Special considerations should be contemplated and discussed before allowing either as an investment option.

Part VII. MANAGER REMOVAL

An investment manager (i.e., fund) may be removed when the Committee has lost confidence in the manager's ability to:

- Achieve performance, style, allocation, and/or risk objectives.
- Maintain acceptable qualitative standards (e.g., stable organization, compliance guidelines).

If the investment manager has failed to adhere to and/or remedy one or both of the above conditions, the fund should be considered for removal from the plan.

Any decision by the Committee to remove such a fund will be made on an individual basis, and will be made based on all the known facts and circumstances, including, but not limited to:



- The objective analysis (described above)
- Administrative impact on the plan
- Timing
- Employee communication issues
- The availability of other (potential replacement) managers
- Underwriting and plan provider limitations
- Financial considerations (hard and soft dollar fees)
- Professional or client turnover
- A material change in the investment process
- Other relevant factors

Considerable judgment should be exercised in the manager removal decision-making process. A manager should be removed using one of the following approaches:

- Remove and replace (map assets) with an alternative manager.
- Freeze the assets managed by the removed manager and direct new assets to an alternative manager.
- Phase out the manager over a specific time period.
- Remove the manager and do not provide a replacement manager.

Replacement of a removed manager follows the criteria outlined in Part VI (Selection of Investment Options).

Part VIII. PARTICIPANT EDUCATION AND COMMUNICATION

The Plan should communicate to employees that they can direct their own investments and investment changes. Investment communications materials, educational materials, and enrollment support should be available to help Plan participants make educated and informed choices, including:

- 1. Periodic enrollment and investment education, through one or more of the following: on-site meetings, phone conference, web conference, Internet, phone (voice-response and live representatives), and written materials;
- 2. ERISA Section 404(c) disclosure:
- 3. Summary plan description made available to all participants;
- 4. General information regarding investment risk, inflation, potential taxation impact, investment earnings, and asset classes;
- 5. Other investment tools (e.g., investment risk profile questionnaire) to assist participants and beneficiaries in making educated and informed investment decisions; and
- All additional information required for disclosure by ERISA, the Internal Revenue Code of 1986, and all other Federal and state statutes and all regulations promulgated hereunder, and all regulatory guidance provided thereto.

Notwithstanding the foregoing, all investment education provided by the Plan and/or Committee, and all communications connected thereto, is not intended, nor shall it be construed, as investment advice to Plan participants.

Part IX. COORDINATION WITH THE PLAN DOCUMENT

Notwithstanding the foregoing, if any term or condition of this Investment Policy Statement conflicts with any section of ERISA or the Internal Revenue Code, or regulations promulgated hereunder, or any term or condition in the Plan document, the terms and conditions of ERISA, the Internal Revenue Code, and the Plan document shall control.

Part X. ERISA 404(c)

The Company and the Committee intend for the Plan to comply with ERISA Section 404(c) and the regulations there under. Each participant/beneficiary is provided the opportunity to exercise control and to give instructions over his/her account with a frequency that is appropriate for each investment option and, finally, to choose from a broad range of investment options. Plan fiduciaries are thus relieved from liability for investment performance directly resulting from investment decisions made by Plan participants.



The intention to comply with ERISA Section 404(c), and the regulations promulgated hereunder, will be communicated to employees in writing.

Part XI. REVIEW PROCEDURES

This Investment Policy Statement will be periodically reviewed and amended, if appropriate, at any time and without notice, by action of the Committee.

It is not expected that this Investment Policy Statement will change frequently. In particular, short-term changes in the financial markets should not require amendments to this Investment Policy Statement.

Name of Plan Fiduciary	Signature	Date
Name of Plan Fiduciary	Signature	Date
Name of Plan Fiduciary	Signature	Date
Name of Plan Fiduciary	Signature	Date
Name of Plan Fiduciary	Signature	Date

ADDENDUM TO PART VII: INVESTMENT MONITORING AND REPORTING

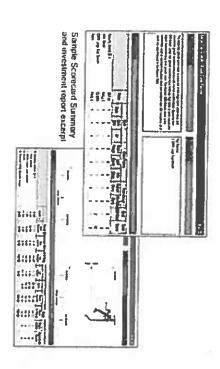
ScorecardSM System Methodology

time period, and Passive strategies are evaluated over a three year time period. measure Active, Passive and Asset Allocation investing strategies. Active and Asset Allocation strategies are evaluated over a five year strategies. The Scorecard^{sa} System is built around passifall criteria, on a scale of 0 to 10 (with 10 being the best) and has the ability to The Scorecard^{aa} System methodology incorporates both quantitative and qualitative factors in evaluating fund managers and their investment

Eighly percent of the fund's score is quantitalive (made up of eight unique factors), incorporating modern portfolio theory statistics, quadratic investment strategy. The following pages detail the specific factors for each type of investing strategies. managing the assels, management or personnel issues at the firm, and/or whether there has been a change in direction of the fund's stated fund's strength of statistics (statistical significance). Other criteria that may be considered in the qualitative score includes the viability of the firm account things such as manager tenure, the fund's expense ratio relative to the average fund expense ratio in that asset class category, and the oplimization analysis, and peer group rankings (among a few of the quantitative factors). The other 20% of the score is qualitative, taking into

and/or identify new top-ranked strategies for inclusion into a plan. discussed as a "walch-list" or removal candidate; what strategies continue to meet some minimum standards and continue to be appropriate; System is meant to be used in conjunction with our sample investment Policy Statement, in order to help identify what strategies need to be inclusion into a plan as an investment option. General fund guidelines are shown in the "Scorecard Point System" table below. The Scorecard Point Combined, these factors are a way of measuring the relative performance, characteristics, behavior and overall appropriateness of a fund for

Poor	Watch List:	Acceptable:	Good:	Scorecard
0-4 Points	5-6 Points	7-8 Points	9-10 Points	Scorecard Point System



Active strategies are investment strategies where the fund manager is frying to add value and out-perform the market avarages (for that style of investing). Typically, these investment strategies have higher associated costs due to the active involvement in the portfolio management process by the fund manager(s). For this type of investment strategy, the Scorecard System is trying to identify those managers who can add value on a consistent basis within their own style of investing.

Quantitative Factors (1-8):

20%	It is important to take into account non-quantitative factors, which may impact future performance.	_
Outstanes anders	Two points may be awarded based on qualitative characteristics of the fund. Primary considerations are given to manager tenure, fund expenses and strength of statistics, however, other significant factors may be considered.	9-10)
	Qualitative Factors (9-10):	Qualita
- Manual	Information Ratio Peer Group Ranking: Fund passes if its median rank is above the 50° percentile. This ranking ranks risk adjusted excess return.	
Out Ostu	Returns Peer Group Ranking: Fund passes if its median rank is above the 50° percentile.	7)
	Information Ratio: Measures a funds relative risk and return. Fund passes if ratio is > 0. This statistic measures the value added above the benchmark, adjusted for risk.	\$
	Up/Down Capture Analysis: Measures the behavior of a fund in up and down markets. Fund passes with an up capture > its down capture. This analysis measures the relative value by the manager in up and down markets.	5)
Risk/Return Factors – 30%	Risk/Return: Fund passes if its risk is less than the benchmark or its return is greater than the benchmark. Favorable risk/return characteristics are desired.	ځ
	R-Squared: Measures the % of a fund's returns that are explained by the benchmark. Fund passes with an R2 > 80%, This statistic measures whether the benchmark used in the analysis is appropriate.	ي
	Style Drift: Returns-based analysis to determine the behavior of the fund/manager over multiple (rotting) time periods. Fund passes if the fund exhibits a consistent style pattern. Style consistency is desired so that funds can be effectively monitored within their designated asset class.	2)
Style Factors — 30%	Style Analysis: Returns-based analysis to determine the style characteristics of a fund over a period of time. Fund passes if it reflects the appropriate style characteristics. Style analysis helps ensure proper diversification in the plan.	3

Passive strategies are investment strategies where the fund manager is trying to track or replicate some area of the market. These types of strategies may be broad-based in rature (e.g., the fund manager is trying to track/replicate the entire U.S. equity market like the S&P 500) or may be more specific to a particular area of the market (e.g., the fund manager may be trying to track/replicate the technology sector). These investment strategies typically have lower costs than active investment strategies due to their passive nature of investing and are commonly reterned to as index funds. For this type of investment strategy, the Scorecard⁵¹² System is focused on how well these managers track and/or replicate a particular area of the market with an emphasis on how they compare against their peers.

Quantitative Factors (1-8):

Two poir strength	ative	2	27	-		-			-
Two points may be awarded based on qualitative characteristics of the fund. Primary considerations are given to fund expenses and strength of statistics, however, other significant factors may be considered.	Qualitative Factors (9-10):	Sharpe Ratio Peer Group Ranking: Fund passes if its median rank is above the 75° percentile.	Returns Peer Group Ranking: Fund passes if its median rank is above the 75° percentile.	Expense Ratio Peer Group Ranking: Fund passes if its median rank is above the 75" percentile.	Tracking Error Peer Group Ranking: Fund passes if its median rank is above the 75° percentile.	Tracking Error: Measures the % of a fund's excess return votability relative to the benchmark. Fund passes with a TE < 4. This statistic measures how well the fund tracks the benchmark.	R-Squared: Measures the % of a fund's returns that are explained by the benchmark. Fund passes with an R2 > 95%. This statistic measures whether the benchmark used in the analysis is appropriate.	Style Drift: Returns-based analysis to determine the behavior of the fund/manager over multiple (rolling) time periods. Fund passes if the fund exhibits a consistent style pattern. Style consistency is desired so that funds can be effectively monitored within their designated asset class.	Style Analysis: Returns-based analysis to determine the style characteristics of a fund over a period of time. Fund passes if it reflects the appropriate style characteristics. Style analysis helps ensure proper diversification in the plan.
Out and the	NAC AND ASSESSMENT OF THE PARTY			Rapiongs -	Puer Group			40%	Style & Tracking Factors
	s may be awarded based on qualitative characteristics of the fund. Primary considerations are given to fund expenses and if statistics, however, other significant factors may be considered.	tors (9-10): smay be awarded based on qualitative characteristics of the fund. Primary considerations are given to fund expenses and if statistics, however, other significant factors may be considered.	alto Peer Group Ranking: Fund passes if its median rank is above the 75th percentile. Stors (9-10): It may be awarded based on qualitative characteristics of the fund. Primary considerations are given to fund expenses and in statistics, however, other significant factors may be considered.	Peer Group Ranking: Fund passes if its median rank is above the 75° percentile. Into Peer Group Ranking: Fund passes if its median rank is above the 75° percentile. Itors (9-10): It may be awarded based on qualitative characteristics of the fund. Primary considerations are given to fund expenses and its statistics, however, other significant factors may be considered.	oup Ranking: Fund passes if its median rank is above the 75th percentile. Alling: Fund passes if its median rank is above the 75th percentile. PRanking: Fund passes if its median rank is above the 75th percentile. PRanking: Fund passes if its median rank is above the 75th percentile. Primary considerations are given to fund expenses and ever, other significant factors may be considered.	sup Ranking: Fund passes if its median rank is above the 75th percentile. Sup Ranking: Fund passes if its median rank is above the 75th percentile. Alling: Fund passes if its median rank is above the 75th percentile. Pranking: Fund passes if its median rank is above the 75th percentile. Pranking: Fund passes if its median rank is above the 75th percentile. See that on qualitative characteristics of the fund. Primary considerations are given to fund expenses and sever, other significant factors may be considered.	es the % of a fund's excess return votability relative to the benchmark. Fund passes with a TE < 4. This statistic and tracks the benchmark. Sup Ranking: Fund passes if its median rank is above the 75th percentile. Sup Ranking: Fund passes if its median rank is above the 75th percentile. Inking: Fund passes if its median rank is above the 75th percentile. PRanking: Fund passes if its median rank is above the 75th percentile. PRanking: Fund passes if its median rank is above the 75th percentile. PRanking: Fund passes if its median rank is above the 75th percentile.	te % of a fund's returns that are explained by the benchmark. Fund passes with an R2 > 95%. This statistic suchmark used in the analysis is appropriate. The statistic estimates the fund's excess return votability relative to the benchmark. Fund passes with a TE < 4. This statistic and tracks the benchmark. The statistic end tracks the benchmark. The statistic end tracks the benchmark. The statistic end track fund passes if its median rank is above the 75° percentile. The properties of the median rank is above the 75° percentile. The properties of the fund passes if its median rank is above the 75° percentile. The properties of the fund passes if its median rank is above the 75° percentile. The properties of the fund passes if its median rank is above the 75° percentile.	ed analysis to determine the behavior of the fund/manager over multiple (noting) time periods. Fund passes if stent style pattern. Style consistency is desired so that funds can be effectively monitored within their 16 % of a fund's returns that are explained by the benchmark. Fund passes with an R2 > 95%. This statistic exchanark used in the analysis is appropriate. The statistic exchanark used in the analysis is appropriate. The statistic end that the benchmark is appropriate. The statistic end that the benchmark. The statistic end tracks the benchmark. The statistic end tracks the benchmark. The statistic end that the statistic statistic is above the 75° percentile. The percentile. The statistic end that the statistic end that is above the 75° percentile. The percentile. The statistic end that the statistic end that is above the 75° percentile. The percentile end of qualitative characteristics of the fund. Primary considerations are given to fund expenses and ever, other significant factors may be considered.

Evaluation Criteria

Asset Allocation Strategies

Asset allocation strategies are invasiment strategies that invest in a broad array of asset classes that may include U.S. equity, international equity, emerging markets, real estate, fixed income, high yield bonds and cash (to name a few asset classes). These strategies are typically structured in either a first-based format (the strategies are invasity and in either a first-based format (the strategies are managed to a retirement date or life expectancy date. Typically growing more conservative as that date is approached). For this type of investment strategy, the Scorecard^{ta} System is focused on how well these managers can add value from both asset allocation and manager selection.

Quantitative Factors (1-8):

2014	It is important to take into account non-quantitative factors, which may impact future performance.	
Dust sites	Two points may be awarded based on qualitative characteristics of the fund. Primary considerations are given to manager tenure, fund expenses and strength of statistics, however, other significant factors may be considered.	9-10)
	Qualitative Factors (9-10):	Qualit
Rareargs	Sharpe Ratio Peer Group Ranking: Fund passes if its median rank is above the 50° percentile. This ranking ranks risk adjusted excess ratum.	
Per Grosp	Returns Peer Group Ranking: Fund passes if its median rank is above the 50° percentile.	7)
	Information Ratio: Measures a funds relative risk and return. Fund passes if ratio is > 0. This statistic measures the value added above the benchmark, adjusted for risk.	٠
	Up/Down Capture Analysis: Measures the behavior of a fund in up and down markets. Fund passes with an up capture > its down capture. This enalysis measures the relative value by the manager in up and down markets.	5)
Risk/Return Factors – 30%	RisidReturn: Fund passes if its risk is less than the benchmark or its return is greater than the benchmark. Favorable risk/return characteristics are desired.	څ
	R-Squared: Measures the % of a fund's returns that are explained by the benchmark. Fund passes with an R2 > 90%. This statistic measures whether the benchmark used in the analysis is appropriate.	ي ا
	Style Diversity: Fund passes if it reflects appropriate style diversity (returns-based) among the four major asset classes (Cash, Fixed Income, U.S. & International Equity) for the given category.	2)
Style Factors -	Risk Level: The fund's standard deviation is measured against the category it is being analyzed in. The fund passes if it falls within the range for that category.	=



Disclosures and Notes

- Some funds, accounts, or share classes used in the enclosed analysis may not be available for investment. Performance history prior to inception (if applicable) reflects another share class or account reflecting the advisor's historical performance record.
- Investment objectives and strategies vary among fund, and may not be similar for funds included in the same asset class.
- Performance data quoted represents past performance and does not guarantee future results. The investment return and principal value of an investment will fluctuate so that an investor's shares, when redeemed, may be worth more or less than their original cost. Current performance may be lower or higher then the performance data quoted.
- The performance data quoted may not reflect the deduction of additional fees, if applicable. If reflected, additional fees would reduce the performance quoted.
- Performance data is subject to change without prior notice
- Performance of indexes reflects the unmanaged result for the market segment the selected stocks represent Indexes are unmanaged and not available for direct investment.
- The information used in the analysis has been taken from sources deemed to be reliable, including, third-party providers such as Markov Processes International, Markingstar, firms who manage the investments, and/or the retirement plan providers who offer the funds.
- Every reasonable effort has been made to ensure completeness and accuracy; however, the final accuracy of the numbers and information is the responsibility of the investment manager(s) of each fund apidor the retirement plan providers offering these funds. Discrepancies between the figures reported in this analysis, and those reported by the actual investment managers and/or retirement plan providers, may be caused by a variety of factors, including: leaccurate reporting by the manager/provider, Changes in reporting by the manager/provider from the time this report was prepared to a subsequent retro-active audit and corrected reporting; Differences in fees and share-classes impacting net investment return; and, Scriveners error preparing this report.
- The enclosed investment Due Diligence report, including the Scorecardsu System, is intended for plan sponeor and/or institutional use only. The materials are not intended for participant use.

- Fund scores will change as the performance of the funds change and as certain factors measured in the qualitative category change (s.g., manager tenure). Fund scores are not expected to change dramstically from each measured period, however, there is no guarantee this will be the case. Scores will change depending on the changes in the underlying prespecified Scorecard factors.
- Neither past performance or statistics calculated using past performance are a guarantee of a fund's future performance. Likewise, a fund's score using the Scorecard^{sus} System does not guarantee the future performance or style consistency of a fund.
- The purpose of this report is to easist fiduciaries in selecting and monitoring investment options. A fund's score is meant to be used by the plan aponsor and/or fiduciaries as a tool for selecting the most appropriate fund.
- Fund selection is at the discretion of the investment fiduciaries, which are either the plan sponsor or the committee appointed to perform that function
- Cash Equivalents (e.g., money market fund) and some specialty funds are not scared by the Scorecard⁵⁴ System.
- The enclosed investment Due Diligence report and Scorecard is not an offer to sell multiplifunds. An offer to sell may be made only after the client has received and read the appropriate prospectus.
- For the most current month-end performance, please contact Retirement Plan Advisory Group at (877) 380-2480.
- Carefully consider the investment objectives, risk factors and charges and expenses of the investment company before investing. This and other information can be found in the fund's prospectus, which may be obtained by contacting your investment Advisor/Consultant or Vendor/Provider. Read the prospectus carefully before investing.
- For a copy of the most recent prospectus, please contact your investment Advisor/Consultant or Vendor/Provider.