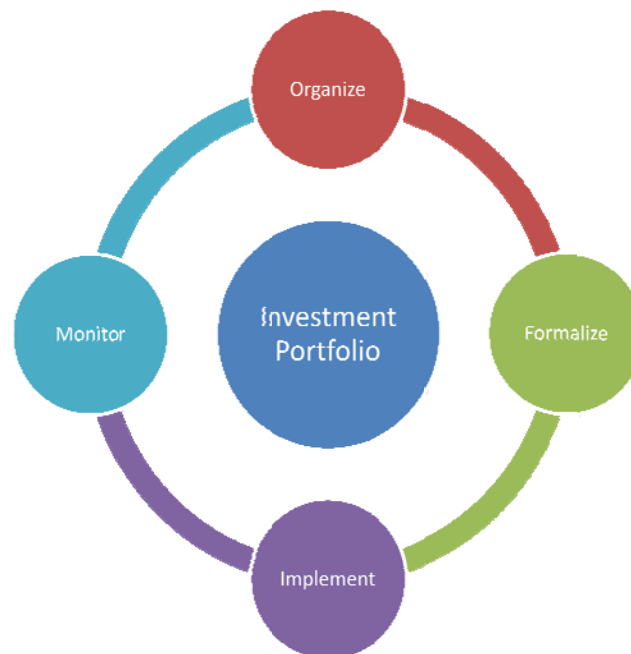


Client Investment Process

A fiduciary, as it relates to investments, is person who is responsible for investing the money for someone else. Fiduciaries are held to certain standards and they may be held liable should these standards not be maintained. To help fiduciaries dutifully discharge their investment responsibilities, we follow a four-step Fiduciary Quality Management System developed by the Center for Fiduciary Studies. The goal of this fiduciary process is to provide clients with a comprehensive investment strategy designed to meet the client's specific goals and objectives. Because we believe that following this process will help clients achieve their investment goals, we utilize it for individual clients as well as fiduciary accounts, such as trusts, charitable organizations, and retirement plans. Following is a summary of our investment process:



Step 1: Organize

During this step we become familiar with your current investment strategy and financial condition. We typically meet with you regarding your investment objectives, time horizon, risk tolerance and general financial condition. This step also entails:

- collection and analysis of existing service agreements and contracts,
- analysis of whether your current investments are in keeping with your long-term goals and objectives,
- review of whether investments are managed in accordance with applicable laws, trust documents, and existing investment policy statements, and
- examination of whether assets are within the jurisdiction of courts, and are protected from theft and embezzlement.

Step 2: Formalize

In step two, we craft an investment strategy designed to meet your specific goals and financial situation. This normally leads to the drafting of an Investment Policy Statement (IPS). The IPS details the investment strategy that will be employed and may be thought of as the “business plan” for management of your portfolio. Documenting the investment process through the use of an IPS is the most important step in fulfilling fiduciary obligations. A properly crafted IPS contains the detail to define, implement, and manage a specific investment strategy. The IPS details such things as:

- the investment time horizon,
- the portfolio risk level,
- the expected modeled return
- the selected assets classes,
- investment restrictions, and if applicable,
- a socially responsible investment strategy.

Step 3: Implement

In step three, the investment strategy is implemented in compliance with the Investment Policy Statement. The investment strategy will be implemented using investment vehicles appropriate for the portfolio’s size and the client’s investment sophistication. During this phase a due diligence process is followed in selecting a custodian, and when applicable, service providers.

Step 4: Monitor

The monitoring phase is vital to evaluating whether you are on course to meeting the goals that were defined in Step 2. During this step, we also reassess your goals and adjust them as needed. Specifically, the monitoring phase is comprised of:

- Periodic reports comparing investment performance against appropriate benchmarks, peer groups, and IPS objectives.
- Periodic reviews of qualitative and/or organizational changes of money managers.
- Review of whether fees for service providers are consistent with agreements and applicable laws.
- Examination of whether control procedures are in place to periodically review policies for best execution, “soft dollars”, and proxy voting.
- For retirement plans, analysis of whether “finder’s fees” or other forms of compensation that may have been paid for asset placement are appropriately applied, utilized, and documented.
- Review of the organizations effectiveness in meeting its fiduciary responsibilities.
- Annual review of the Investment Policy Statement, which includes the analysis, and if needed, updating of your stated goals.