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SCHEDULE H

Select Trac Program

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Select Trac ETF Program

DISCLOSURE BROCHURE

Sponsored by:

Gary Goldberg Planning Services, Inc.
75 Montebello Road
Suffern, NY 10901
845-368-2900

This brochure provides clients with information about Gary Goldberg Planning Services, Inc. (hereinafter "GGPS"), and its Select Trac Program and the Select Trac ETF Program that should be considered before becoming a client of these Programs. This information has not been approved or verified by any governmental authority.

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DESCRIPTION OF SELECT TRAC MF PROGRAM AND ETF PROGRAM

Gary Goldberg Planning Services, Inc., offers the Select Trac Program and Select Trac ETF Program (jointly the "Programs") to individuals, pension and profit sharing plans, trusts, estates, corporations, and other business entities. GGPS is a corporation organized under Delaware law, and is registered as an investment adviser with the U.S. Securities and Exchange Commission. GGPS maintains its principal office at 75 Montebello Road, Suffern NY 10901. If you have questions regarding the material contained herein, please contact GGPS at 1-845-368-2900.

This Brochure contains important information about GGPS and the Programs. GGPS offers other advisory services which are described in the firm's Form ADV-Part II.

GGPS is the sponsor and investment adviser for the Programs. Under the Programs, clients receive investment advisory, custodial, and brokerage execution services for a single asset-based fee. The client is not charged separately for the various components of the Program services. GGPS and its representatives actively solicit advisory clients for the Programs, and GGPS is responsible for marketing the Programs.

Client accounts in the Programs will be maintained with National Financial Services LLC ("NFS"), which is a broker-dealer and member of The Financial Industry Regulatory Authority ("FINRA"). NFS is the clearing firm for GGPS's affiliated broker-dealer, Gary Goldberg & Co. ("GGCo"), member FINRA. Please see below for important information regarding GGPS, GGCo, and NFS.

Select Trac Program

In the Select Trac Program (the "MF Program"), GGPS manages client accounts on a discretionary basis through asset allocation and investment strategies developed by GGPS primarily using no-load mutual funds or front-end load funds purchased at NAV. In certain circumstances, GGPS may fulfill one or more asset classes by purchasing an exchange-traded fund or other securities instead of by purchasing a mutual fund. GGPS, through its representative, will assist the client in selecting a Program strategy that is suitable for the client, based on information provided by the client regarding the client's investment goals, objectives, risk tolerance, and investment time horizon. Strategies include Growth, Moderate Growth, Balanced Growth, and Starter Portfolio. Additional strategies may be developed based on clients' needs and objectives.

Upon selection of an appropriate strategy, the client's account will be invested in a portfolio of no-load mutual funds and front-end load mutual funds purchased at NAV (and potentially other types of securities) that reflects the strategy designated by the client. GGPS will continuously manage the client's account to ensure that it reflects the designated strategy. As a discretionary program, GGPS will generally implement purchases, sales, and other transactions with respect to the assets in the client's account without client's prior knowledge or consent.

Generally, client accounts in the MF Program will hold only the investments purchased by GGPS as part of the designated strategy, and clients will not be permitted to hold other securities in the MF Program account. However, in certain limited circumstances, MF Program clients may be permitted to transfer into their MF Program account certain stocks, bonds, or other securities that were purchased outside of the account that are not part of the selected MF Program strategy ("Non-Strategy Assets"). Clients will be permitted to trade the Non-Strategy Assets without commissions or other transaction charges. In general, GGPS will manage the account so that Non-Strategy Assets are liquidated over time and the proceeds invested according to the selected strategy.

Non-Strategy Assets will not be subject to the Program Fee until NFS receives such assets in good form and they have been deposited or settled into the client's MF Program account. In the event that GGPS determines that it is inappropriate, impractical, or otherwise undesirable for any Non-Strategy Assets to be held (or to be continued to be held) in the client's MF Program account, GGPS may require the client to transfer the Non-Strategy Asset out of the Program account, at the client's expense, which may include commissions or other transaction costs.

<u>Select Trac ETF Program</u>

In the Select Trac ETF Program (the "ETF Program"), GGPS manages client accounts on a discretionary basis through asset allocation and investment strategies developed by GGPS primarily using exchange-traded funds ("ETFs"). In certain circumstances, GGPS may fulfill one or more asset classes by purchasing other securities instead of by purchasing an exchange-traded fund. GGPS, through its representative, will assist the client to select an ETF Program strategy that is suitable for the client, based on the client's investment goals, objectives, risk tolerance, and investment time horizon. Strategies include Growth, Moderate Growth, and Balanced Growth. Additional strategies may be developed based on clients' needs and objectives.

Upon selection of an appropriate strategy, the client's account will be invested in a portfolio of ETFs (and potentially other types of securities) that reflects the strategy selected by the client. GGPS will continuously manage the client's account to ensure that it reflects the designated strategy. As a discretionary program, GGPS will generally implement purchases, sales, and other transactions with respect to the assets in the client's account without client's prior knowledge or consent.

Generally, client accounts in the ETF Program will hold only the investments purchased by GGPS as part of the designated strategy, and clients will not be permitted to hold other securities in the ETF Program account. However, in certain limited circumstances, clients may be permitted to transfer into their ETF Program account certain stocks, bonds, or other securities that were purchased outside of the account that are not part of the selected ETF Program strategy ("Non-Strategy Assets"). Clients will be permitted to trade the Non-Strategy Assets without commissions or other transaction charges. In general, GGPS will manage the account so that Non-Strategy Assets are liquidated over time and the proceeds invested according to the selected strategy.

Non-Strategy Assets will not be subject to the ETF Program Fee until NFS receives such assets in good form and they have been deposited or settled into the client's ETF Program account. In the event that GGPS determines that it is inappropriate, impractical, or otherwise undesirable for any Non-Strategy Assets to be held (or to be continued to be held) in the client's ETF Program account, GGPS may require the client to transfer the Non-Strategy Asset out of the ETF Program account, at the client's expense, which may include commissions or other transaction costs.

CUSTODY AND TRANSACTION PROCESSING

Custody of the accounts in the MF Program and ETF Program will be maintained by National Financial Services, LLC ("NFS"), an unaffiliated broker-dealer which also acts as the clearing firm for the purchase and sale of mutual fund and ETFs shares, as well as other securities, in the Program accounts. Mutual fund and ETF share transactions for the Program accounts are processed through GGCo, a registered broker/dealer and the parent company of GGPS.

PROGRAM FEES

Program Fee Schedule

Clients in the Programs pay GGPS a quarterly asset-based fee for investment advisory services provided by GGPS and trade execution and custody services provided by GGCo and NFS. The fee is based on a percentage of the assets in the account, as follows (subject to any special arrangement negotiated with a particular client):

Assets in Account	Annual Fee as Percentage of Account Assets
Up to $100,000	1.875%
Up to $350,000	1.75%
Up to $650,000	1.50%
Up to $1,000,000	1.25%
Over $1,000,000	1.00%

This linear fee structure will result in a blended rate on all assets managed by GGPS in any of its asset management programs excluding assets managed in the Fund Trac Variable Managed Annuity Program. Assets in in brokerage accounts with GGCo. are also excluded.

For example, an account with $200,000 under management in the MF Program and $200,000 under management in an ETF program would pay an effective annual management fee to GGPS of 1.5% on both accounts.

General Fee Issues

GGPS shares the fees it collects with the applicable GGPS representative, GGCo and NFS. The GGPS representative recommending one of the Programs to the client receives compensation as a result of the client's participation in the Program. This compensation may be more than what the representative would receive if the client participates in other program or paid separately for investment advice, brokerage, and other services. Thus, the representative may have a financial incentive to recommend the Program over other programs or services.

Because the Program Fee covers only transactions executed through GGCo and NFS, transactions (including transactions involving the Non-Strategy Assets) will generally be executed through GGCo and NFS. Transactions will be effected through a broker or dealer other than GGCo and NFS only when required by applicable law. In instances where a transaction is executed through a broker or dealer other than GGCo and NFS, the account may incur a transaction fee, commission, and/or other charges, as applicable. In effect, clients who decide to participate in the MF Program or ETF Program are choosing and directing the use of GGCo's and NFS's brokerage execution and custodial services for all assets held in their Program account. GGCo and GGPS will receive benefits (in addition to the Program Fees described in this Brochure) that they would not receive if client's account were held by another custodian or client's orders were executed by another broker.

Clients should understand that GGPS has a conflict of interest in recommending its affiliated broker-dealer and in recommending the associated services of GGCo's clearing firm. As GGCo processes more accounts and transactions through NFS, it may be able to use these transactions to meet its minimum monthly clearing fees. This provides a benefit to GGCo, even if no additional commissions are charged. In addition, GGCo receives other fees from NFS, such as rebates on money market or margin account balances, based on accounts and balances carried with NFS. Also, as described elsewhere, to the extent GGCo executes commissionable transactions for advisory clients of GGPS, the firm has a strong incentive to earn additional revenue by encouraging GGPS to refer advisory clients to GGCo.

GGPS recommends the services of GGCo and its clearing broker, NFS, to effect securities trades and to perform related functions, such as clearance, settlement, and custody. This recommendation is based largely on the fact that GGCo is a GGPS affiliate and the firm is therefore able to achieve greater operational efficiency and economies of scale. GGPS also believes that this recommendation is in the best interests of its clients as the affiliation permits discounted commission rates; a comprehensive execution and account servicing platform; experience with and familiarity with NFS's system by GGPS associates and employees; and GGPS's generally high opinion of NFS's customer service.

Other considerations are the technological access to NFS available to GGCo and GGPS. GGPS also believes that customers are well-served by NFS's ability to custody a wide range of assets. GGPS, through GGCo, receives some research services from NFS. Such information may be used to service all of the firm's advisory accounts, without regard to whether a particular client actually holds an account with NFS.

GGPS or GGCo may purchase through NFS, or through independent companies, computer equipment and/or real-time computer data to facilitate sending and receiving account information. NFS may periodically make available vendor discounts on computer equipment, conferences, and software, to firms clearing through NFS.

GGCo's and NFS's execution services and procedures are designed to obtain the best execution possible under the circumstances then existing, but with respect to any particular client order there can be no assurance that best execution will be obtained. Clients should consider whether or not the appointment of GGCo and NFS as the sole broker-dealers for the client's Program account may or may not result in less favorable executions than client might receive from other broker-dealers. In directing the use of GGCo and NFS, it should be understood that GGPS will not have authority to negotiate commissions among various brokers, nor will it be able to direct client orders to brokers who might offer price improvements. Consequently, best execution may not be achieved.

Depending on the amount of the fee charged by GGPS, the amount of portfolio activity in the client's account, the value of custodial and other services which are provided under the Program, and other factors, the fee for either the MF Program or the ETF Program may exceed the total cost of such services if they were to be provided separately and if GGPS were to negotiate commissions and seek best price and execution of transactions.

<u>Other Costs; Billing Practices</u>

The Program Fees are debited by the custodian on a quarterly basis in advance, based on the average daily balance in the client account during the preceding quarter. The average daily balance in the client's account will include any Non-Strategy Assets.

The Program Fee for the first period is debited at the beginning of the first full month the account is open, and is based on the average daily balance for the period the account has been open. Program Fees are prorated for any partial period. In the event of advisory agreement termination, the Adviser will refund pre-paid fees on a pro-rata basis calculated from the date of termination through the end of the quarter.

The Program Fee does not include certain administrative fees charged by NFS, such as fees for wire transfers or certificate issues, IRA account fees, account closing fees or mail expenses.

Securities transactions effected for the client accounts in the ETF Program may also include mark-ups, mark-downs, or dealer spreads to market makers or other principals from whom ETFs were obtained by the broker dealer. These mark-ups, mark-downs, or dealer spreads will be retained by the market maker or other principal and will not be credited or reimbursed to the client's account.

<u>Changes to Program Fee</u>

The amount of the Program Fee will continue until 30 days after GGPS has notified client in writing of any change in the amount of the Program Fee. As of the end of such 30-day period, the new fee will become effective unless client terminates the client agreement.

Possibility of Lower Fees

Clients should be aware that lower fees for comparable services may be available from other advisers.

Negotiability of Fees

In certain circumstances, GGPS may agree to negotiate its fees. GGPS may charge different clients receiving the same services different fees. The fee schedule included in the Brochure is the firm's basic fee schedules generally charged to clients absent negotiable circumstances.

Principal and Agency Cross Transactions

GGPS is a subsidiary of GGCo, a registered broker/dealer. GGCo and its president, Gary M. Goldberg (who is also the president of GGPS), may buy securities for itself as principal from, or sell securities to, any client of GGPS who may also have a brokerage account with GGCo. GGCo will generally not execute principal transactions with clients in Program accounts. However, in accordance with applicable law and regulation, GGCo may on rare occasions execute principal trades for Program accounts. In addition, GGCo will generally not execute "agency-cross" transactions (i.e., transactions for which GGCo acts as broker for both the client and the counterparty to the transaction). However, GGCo may on rare occasions execute agency-cross transactions for Program accounts in accordance with applicable law and regulations. Because GGCo may receive compensation from the other party to such transaction, GGCo may have a potentially conflicting division of loyalties and responsibilities in effecting agency-cross transactions. Clients who have authorized such transactions may revoke this authorization at any time by written notice to GGCo.

Mutual Fund and ETF Fees and Expenses

All fees paid to GGPS are separate and distinct from the internal fees and expenses charged by mutual funds or ETFs to their shareholders.

These fees and expenses are described in each fund's or ETF's prospectus or summary disclosure document. These fees will generally include a management fee, other internal expenses, and a possible distribution fee. Clients should also understand that shares of certain mutual funds offered in these programs may impose short-term trading charges (typically 1% - 2% of the amount originally invested) for redemptions generally made within short periods of time. Clients should consider these short-term trading charges when selecting the program and/or mutual funds in which they invest.

A client could invest in mutual funds or ETFs directly, without the services of GGPS. In that case, the client would not receive the services provided by GGPS which are designed, among other things, to assist the client in determining which mutual funds or ETFs are appropriate to the client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and ETFs and the fees charged by Adviser to fully understand the total amount of fees to be paid by the client and evaluate the advisory services being provided.

Additional Compensation to GGCo

Client has directed that GGPS direct all transactions involving the Program accounts to its affiliated broker-dealer, GGCo, and its clearing firm, NFS. GGCo may receive 12b-1 fees or other distribution or marketing fees from mutual funds in which the client's account is invested. In view of the availability of such payments to its affiliate, GGPS has a conflict of interest in recommending such funds.

In addition, the amount of compensation received by GGPS as a result of the client's participation in the Program may be more than what GGPS would receive if the client paid separately for investment advice, brokerage, custody and other services. Therefore, GGPS and its representatives may have a financial incentive to recommend the Program over other advisory programs or services.

Terminations & Refunds

A client agreement may be canceled at any time, by either party, for any reason, upon prior written notice to the other party, as provided in the client agreement. Upon termination of the client agreement, any prepaid, unearned fees will be promptly refunded. The client has the right to terminate the client agreement without penalty within five business days after entering into the agreement. In the event of withdrawal of all or substantially all of the assets from the account or the termination of the account, customary commissions and other expenses associated with liquidating or transferring the account will be charged to the client.

PROGRAM INVESTMENTS

As explained above, GGPS will recommend that the client's portfolio in the MF Program be invested in a portfolio of mutual funds; and will recommend that the client's portfolio in the ETF Program be invested in a portfolio of ETFs.

ETFs are a type of Investment Company that aims to achieve the same return as a particular market index. They can be either open-end companies or unit investment trusts. ETFs are not considered to be, and are not permitted to call themselves, mutual funds. ETFs differ from mutual funds and UITs because shares issued by ETFs trade on a secondary market. Also, unlike mutual funds, shares of ETFs are redeemable from the fund itself only in very large blocks (blocks of 50,000 shares for example).

ETFs offer the advantage of trading an index portfolio with the ease of stock trading. Investors can purchase ETF shares on margin, short sell shares, or hold for the long term. Investors also achieve market exposure consistent with the Index on which they are based, through one security. ETFs are also designed to be cost efficient because they are based on an Index, rather than being actively managed. **Investment returns and principal value will fluctuate so that an investor's ETF shares, when sold, may be worth more or less than the original cost.**

Some ETFs deliver a prospectus to secondary market purchasers. ETFs that do not deliver a prospectus are required to give investors a document known as a Product Description, which summarizes key information about the ETF and explains how to obtain a prospectus. All ETFs will deliver a prospectus upon request. Before purchasing ETF shares, Client should carefully read all of an ETF's available information, including its prospectus.

GGPS's investment committee will review regularly the performance of the Program strategies using standards generally accepted in the industry, and will also review periodically the accuracy of the performance calculations.

Certain employees of GGPS are members of Montebello Partners LLC, ("MPLLC") a Delaware Limited Liability Company and an Investment Advisory Firm registered with the Securities and Exchange Commission. MPLLC manages a mutual fund called the GMG Defensive Beta Fund, which will be used in most or all of GGPS investment programs. Clients will pay, and MPLLC will receive, a separate management fee from GMG Defensive Beta Fund.

METHODS OF ANALYSIS, SOURCES OF INFORMATION, AND INVESTMENT STRATEGIES

The mutual funds and ETFs selected by GGPS will be chosen on the basis of any or all of the following criteria: the investment's performance history; the industry sector in which the fund or ETF invests; the track record of the fund's or ETF's manager; the fund's or ETF's investment objectives, management style and philosophy, and management fee structure. GGPS utilizes several data resources in gathering pertinent investment information, including financial newspapers and magazines, research materials and reports, corporate rating services, annual reports, prospectuses, and SEC filings. Research services are also used for some strategies from time to time.

Using charts, technical, fundamental, or cyclical analysis, as appropriate for the designated strategy under circumstances then existing, mutual funds and ETFs will be continuously monitored and evaluated relative to market and industry conditions. Portfolio weighting between funds or ETFs and market sectors will be determined according to the specific objectives of the designated strategy.

Clients will have the opportunity to place reasonable restrictions on the investments which will be made on the client's behalf. Clients will retain individual ownership of all securities in their Program account. GGPS may use money market mutual funds to "sweep" unused cash balances until they can be appropriately invested.

Client should be aware that losses may be incurred through mutual fund or ETF investments. GGPS makes no guarantees as to account performance. Past performance is not indicative of or a guarantee of future results. GGPS does not make any representation or guarantee that the Programs' strategies will be successful. Clients could lose money in the Programs.

Mutual funds and ETFs are obligated to distribute portfolio gains to shareholders by year-end. These gains may be generated due to index rebalancing or to meet diversification requirements. ETF trading can generate tax consequences and transaction expenses. Certain traditional mutual funds can be tax inefficient.

GGPS may enter into sub-advisory agreements with other advisors to create portfolio models. Under these agreements, the sub-advisor renders impersonal advice to GGPS. This advice is in accordance with information from GGPS concerning a portfolio model's goals and objectives, as well as any special instructions or limits. The sub-advisor will also provide wholesaling, marketing and sales support services to GGPS and its associates. The sub-advisor provides GGPS with ongoing economic analysis, portfolio design, model design, and securities selection. GGPS, and not the sub-advisor, is responsible for determining whether a given model is appropriate for GGPS clients, as well as for actually implementing the impersonal advice rendered by the sub-advisor to GGPS.

GGPS' Investment Advisory Agreement will contain language whereby Client directs the advisor to accept on client's behalf copies of the prospectus for any investments purchased by the advisor for the client's account, and will provide that such language will serve as evidence to third parties of advisor's authority to receive prospectuses on client's behalf. The Agreement will provide that advisor will furnish copies of such prospectuses to client upon client's written request.

EDUCATION AND BUSINESS STANDARDS

Associates must hold all licenses or registrations required by any jurisdiction in which the firm or its representatives conduct business.

EDUCATION AND BUSINESS BACKGROUND

Gary M. Goldberg, President of GGPS, determines the overall investment policies with regard to advice given to clients of GGPS. Mr. Goldberg was born in 1940. He obtained a Bachelor of Arts in Liberal Arts from Bard College in 1961. He attended Brooklyn Law School for 1-1/2 years.

Mr. Goldberg has been the President of GGPS since it was established in 1973, and also serves as President of GGPS's parent and affiliated broker/dealer, GGCo. He is also a member of the GGPS Strategic Investment Committee.

Oliver Pursche received a degree in Business Communications from Bentley College. Mr. Pursche was born in 1970. He has been in the financial services industry for over 14 years.. Mr. Pursche currently serves as Senior Vice President for GGCo and GGPS. He is also a member of the GGPS Strategic Investment Committee.

Peter Dedel is a graduate of Lehigh University, attended Wesleyan and holds two graduate degrees from Columbia. Mr. Dedel was born in 1948. He has been with GGCo since 1979, and is the Vice President, Portfolio Manager for GGPS. He is also a member of the GGPS Strategic Investment Committee.

William Krivicich earned his Bachelor of Science degree in Finance from the State University of New York at New Paltz. Mr. Krivicich was born in 1968. He joined the firm in 1997. Mr. Krivicich currently serves as GGPS's Chief Investment Officer and holds the designation of Chartered Financial Analyst. He is also a member of the GGPS Strategic Investment Committee.

Richard Kersting earned his Bachelor's degree in Finance and Economics from the State University of New York at Albany. Mr. Kersting was born in 1965. He has been in the financial services industry for over 19 years and joined the firm in 2005. Mr. Kersting currently serves as Vice President, Investment Consultant and is also a member of the GGPS Strategic Investment Committee.

Jannine Barbosa holds a Bachelor of Science degree in Finance from the State University of New York at Oswego. Ms. Barbosa was born in 1975. She joined the firm in 1999 and currently serves as GGPS's Chief Operating Officer and GGCo's Compliance Officer.

Thomas Cattani holds a Juris Doctor degree from Rutgers University. Mr. Cattani was born in 1961. He joined the firm in 2007 and currently serves as GGCo's and GGPS's Chief Compliance Officer.

OTHER BUSINESS ACTIVITIES

GGPS is a subsidiary of GGCo, a broker-dealer. GGPS and GGCo share common officers and employees. The primary focus of GGCo and its associates is the sale of investment and insurance products for a commission. In addition, where GGPS or an affiliate serves as General Partner for any private investment limited partnership, GGPS may recommend that advisory clients invest in these vehicles outside of the Programs. GGPS will receive separate management fees for these services, and GGCo will typically earn a transaction-based commission of up to 5%.

OTHER FINANCIAL INDUSTRY ACTIVITIES OR AFFILIATIONS

GGPS is a subsidiary of GGCo, a broker/dealer registered with the Securities and Exchange Commission and a member of FINRA. GGCo and its registered representatives may receive compensation in the form of commissions and 12b-1 fees for securities products sold through the broker/dealer, as well as other economic benefits describe in other sections of this Brochure. The recommendation by GGPS of products or services for which its affiliate will receive compensation or other economic benefits constitutes a conflict of interest. Certain Program clients also may maintain brokerage accounts at GGCo for which GGPS does not act in an advisory capacity. GGPS Representatives are generally also broker-dealer representatives of GGCo. The payment of commissions in these brokerage accounts is negotiated on an entirely separate basis from the payment of fees in the Programs.

GGCo, parent of GGPS, acts as an insurance agency. Certain GGPS representatives are licensed insurance agents associated with insurance companies. Such representatives provide clients of GGPS with the opportunity to obtain various insurance products for which the representatives receive separate commissions from the insurance company offering the product. Products sold through insurance agencies pay a commission to the firm and the representative. GGPS and its associates have a conflict of interest when recommending insurance products for which they will receive additional compensation. Clients are always free to decline insurance recommendations, or may choose to implement those recommendations through channels unaffiliated with GGPS.

Certain employees of GGPS are members of Montebello Partners LLC, ("MPLLC") a Delaware Limited Liability Company and an Investment Advisory Firm registered with the Securities and Exchange Commission. MPLLC manages a mutual fund called the GMG Defensive Beta Fund, which will be used in most or all of GGPS programs. Clients will pay, and MPLLC will receive, a separate management fee from GMG Defensive Beta Fund.

CODE OF ETHICS

GGPS has adopted a Code of Ethics expressing the firm's commitment to ethical conduct. GGPS 's Code of Ethics describes the firm's fiduciary duties and responsibilities to clients, and sets forth GGPS's practice of supervising the personal securities transactions of supervised persons with access to client information. Individuals associated with GGPS may buy or sell securities for their personal accounts identical to or different than those recommended to clients. It is the expressed policy of GGPS that no person employed by GGPS shall prefer his or her own interest to that of an advisory client or make personal investment decisions based on the investment decisions of advisory clients.

To supervise compliance with its Code of Ethics, GGPS requires that anyone associated with this advisory practice with access to advisory recommendations provide initial/annual securities holdings reports and quarterly transaction reports to the firm's Chief Compliance Officer. GGPS requires such access persons to also receive approval from the Chief Compliance Officer prior to investing in any IPOs or private placements (limited offerings).

GGPS requires that all individuals must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices. GGPS 's Code of Ethics further includes the firm's policy prohibiting the use or misuse of material non-public information. Any individual not in observance of the above may be subject to discipline.

GGPS will provide a complete copy of its Code of Ethics to any client upon written request to the Chief Compliance Officer at GGPS’s principal address.

CONDITIONS FOR MANAGING ACCOUNTS

Select Trac Program

The minimum account size is $50,000. Exceptions will be permitted at the discretion of GGPS.

Select Trac ETF Program

The minimum account size is $100,000. Exceptions will be permitted at the discretion of GGPS.

ACCOUNT REVIEWS

Members of the GGPS investment committee will review the designated strategy on an ongoing basis, and may make changes in the asset allocation among the funds or ETFs in their discretion. Accounts will be reviewed on a regular basis by the representative assigned to client’s account. The representative will contact the client at least annually to discuss the Program account, to determine if there have been any changes in the client’s personal or financial situation, investment objectives, risk tolerance, or investment time horizon, and whether the client wishes to impose any new restriction or modify any existing restriction with respect to the Program account. Client will also receive monthly or quarterly statements from NFS reflecting all holdings, positions, and activity in the Program account.

Client’s principal contact with GGPS will be through the representative assigned to the client’s account, and through the reports GGPS provides. Clients will not generally have access to the Investment Committee which manages the strategies for each Program.

SOLICITATION OR REFERRAL ARRANGEMENTS

GGPS may enter into solicitation agreements through which it will receive compensation for referring clients to other investment advisory programs. Vendors or sub-advisors used by GGPS may pay for training and marketing support to assist GGPS in considering and recommending its products. These sub-advisors may also grant GGPS access to their web site and provide discounted software, sample investment calculators, and other forms used by GGPS in the routine conduct of its business.

Where GGPS acts a solicitor, the firm will refer investors to other advisors and receive a referral fee for doing so. The firm currently has no formal arrangements to solicit on behalf of other advisors. Where it does so, however, GGPS will provide a separate disclosure statement describing the arrangement and the compensation to be paid to GGPS. The client will also receive the other advisors disclosure documents. In all cases, solicitation fees or sub-Program Fees are paid out of the advisor’s stated management fee; clients do not pay an additional fee to GGPS and the fees charged are not otherwise increased.

GGPS associates are compensated through receipt of a portion of the asset-based fee. As such, they receive more compensation when they bring in new clients to GGPS, and that compensation may be more than what the person would receive if the client participated in other programs, or paid separately for investment advice, brokerage, and other services. In addition, the firm periodically offers incentive arrangements whereby associates receive a higher level of compensation based on assets brought to the firm in a specific time period.

Therefore, GGPS's associates have a financial incentive to recommend the Programs over other programs or services.

GGPS may from time to time pay referral fees to GGCo, or its employees, an affiliated broker/dealer, for referrals of clients, where allowable by law. These referral fees would be paid out of the Program Fees paid to GGPS so there would be no additional charge to the referred client.

PROXY VOTING

GGPS does not generally have authority to vote proxies on behalf of clients. Clients in the programs must make arrangements to receive proxy materials from the custodian and are responsible for voting their proxies. GGPS will provide a copy of its Proxy Voting procedures to any client upon written request to the Chief Compliance Officer at GGPS's principal address.