

INVESTMENT POLICY STATEMENT

Investor(s): _____

Advisor: _____ Date: _____

INVESTMENT POLICY DISCUSSION

What is an Investment Policy?

An investment policy outlines and prescribes a prudent and acceptable individualized investment philosophy, and sets out the investment management procedures and long-term goals for the investor.

The Need for a Written Policy

Requirements to which company retirement plans were subject originally created the need for written investment policies. We have found the process so useful that we have expanded the concept and now make use of written investment policies for all of our clients.

A written investment policy allows our clients to clearly establish their investment time horizon and goals, their tolerance for risk (as measured by historic volatility) and the prudence and diversification standards, which they want the investment process to maintain.

INTRODUCTION

The purpose of this Investment Policy Statement (IPS) is to establish a clear understanding between the "Investor" listed above and the "Advisor" listed above as to the investment objectives and policies applicable to the Investor's Investment portfolio. This Investment Policy Statement will:

- Establish reasonable expectations, objectives and guidelines for the investment of the Portfolio's assets.
- Set forth an investment structure detailing permitted asset classes and the desired allocation among asset classes.
- Encourage effective communication between Advisor and the Investor.
- Create the framework for a well-diversified asset mix that can be expected to generate acceptable long-term returns commensurate with the level of risk suitable to the Investor.
- Serve as a reference over time to provide long-term discipline for an established investment plan.
- Describe constraints, which Investor chooses to place on the investment strategy.

This IPS is not a contract but will provide the framework within which the Investment Advisor will exercise discretion on Investor's behalf. This IPS is intended to be a summary of an investment philosophy that provides guidance for the Investor and Advisor.

INVESTMENT OBJECTIVES

The Investor's objective for the investment assets of the accounts, is _____ accompanied by an appropriate level of risk tolerance prescribed by the Investor. The Investor has no expected immediate need of the assets in this account and is willing to accept short-term volatility in order to achieve higher expected rates of return over the long run. The Investor's performance objective is to equal or exceed _____ (assuming a time horizon of at least ten years). However, no guarantees can be given about future performance and nothing contained in this IPS shall be construed as offering such a guarantee.

Comments:

LIQUIDITY AND INCOME NEEDS

The Investor's income need from the investment portfolio is \$ _____ per year. Diminution of portfolio value due to prolonged periods of poor market performance may require an alteration of investment policy.

Comments:

TIME HORIZON

For the purpose of planning, the investor's time horizon for these investments is to be _____ years. Capital values do fluctuate and the Investor recognizes that the possibility of capital loss does exist. Historical asset class return data suggests the shorter the holding period the greater the risk of the investor's objective not being achieved.

Comments:

RISK TOLERANCE

The Investor recognizes that seeking increased returns generally involves accepting greater volatility and risk. In determining Investor's own risk tolerance, Investor acknowledges that since January 1, 1978 through December 31, 2014, a portfolio with the approximate asset allocation being implemented under this IPS experienced the following:

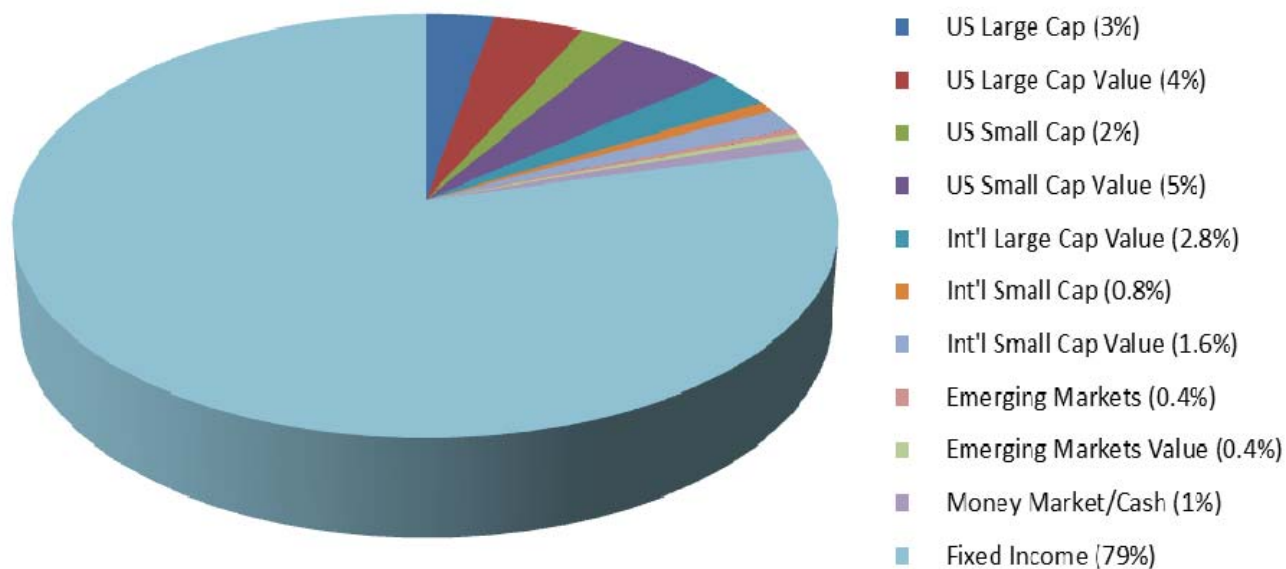
| Worst single calendar year decline in value | Worst 3-yr annualized average rolling return | % of calendar quarters with negative returns | # of times 2 consecutive negative quarters | # of times 3 consecutive negative quarters |
|--|---|---|---|---|
| -5.55% | 2.11% | 15.5% | 3 | 2 |

Investor understands that similar results in the future are possible, and is prepared to tolerate such short-term performance in order to meet Investor's longer-term objectives.

The Portfolio will be managed in a manner that seeks to minimize principal fluctuations within realistic market expectations consistent with the chosen target asset allocation over the established horizon and is consistent with the stated objectives. Financial research has demonstrated that risk is best minimized by holding assets over time and through diversification of assets, including international investments. Investor recognizes, however, that performance results cannot be guaranteed and historical performance is not indicative of future performance.

ASSET ALLOCATION

Academic research suggests that the decision on how to allocate total assets among various asset classes will have far greater impact upon portfolio performance than security selection and market timing. After reviewing the long-term performance and risk characteristics of various asset classes and balancing the risks and rewards of market behavior, the following asset classes were selected to achieve the objectives of the Investor's Portfolio, as stated above, subject to any constraints listed below:



ASSET ALLOCATION (continued)

| ASSET CLASS | % OF PORTFOLIO | | |
|-------------------------------|----------------|------------|-------|
| | Min | Target | Max |
| Domestic | | | |
| U.S. Large Cap | 2.25 | 3 | 3.75 |
| U.S. Large Cap Value | 3 | 4 | 5 |
| U.S. Small Cap | 1.5 | 2 | 2.5 |
| U.S. Small Cap Value | 3.75 | 5 | 6.25 |
| TOTAL DOMESTIC EQUITIES | 10.5 | 14 | 17.5 |
| International | | | |
| International Large Cap Value | 2.1 | 2.8 | 3.5 |
| International Small Cap | 0.6 | 0.8 | 1 |
| International Small Cap Value | 1.2 | 1.6 | 2 |
| Emerging Markets | 0.3 | 0.4 | 0.5 |
| Emerging Markets Value | 0.3 | 0.4 | 0.5 |
| TOTAL INTERNATIONAL EQUITIES | 4.5 | 6 | 7.5 |
| TOTAL EQUITY | 15 | 20 | 25 |
| Fixed Income | | | |
| Money Market/Cash | 0.75 | 1 | 1.25 |
| Fixed Income | 59.25 | 79 | 98.75 |
| TOTAL FIXED INCOME | 60 | 80 | 100 |
| GRAND TOTAL | | 100 | |

For smaller accounts the actual investment allocation will be completed using funds which combine multiple asset classes listed above to minimize transaction costs. These funds are expected to approximate the actual performance of the asset classes listed above. We will invest in the appropriate asset classes as cash is available. This may take time and all asset classes as allocated above may not immediately be covered.

Other assets considered in determining this allocation:

Investment constraints and/or preferences:

INVESTMENT STRATEGY AND REVIEW

Diversification

Investment of the funds shall be limited, in general, to passively managed mutual funds or direct fixed income obligations in the following categories:

- Cash and cash equivalents, including money market funds and bank certificates of deposit.
- Bonds (investment grade or better corporate, U.S. government, municipal, or foreign government).
- Stocks (U.S. and foreign-based companies).
- Real Estate (REIT'S) and/or Commodities.

Investment Management

Generally, only passively managed asset class mutual funds shall be chosen. This strategy is employed to capture the return behavior of an entire asset class. This approach is based upon the major tenets of Modern Portfolio Theory which states that markets are "efficient" and that investors' returns are determined principally by asset allocation decisions, not market timing or selection of specific securities. Advisor does not rely on economic forecasts, employ strategies which shift allocations between stocks, bonds and cash or search for "undiscovered" stocks. Asset classes with historically demonstrated low correlation and different risk/return profiles are combined together in an attempt to both lower the volatility of the overall portfolio and enhance returns.

Portfolio Review and Rebalancing Procedures

From time to time, market conditions may cause the Portfolio's investment in various asset classes to vary from the established target allocation guidelines established by this IPS. Each asset class in which the Portfolio is invested shall be reviewed on a quarterly basis by Advisor and may be rebalanced back to the recommended weighting when appropriate. Except however, rebalancing will be advised if the weighting of an individual asset class varies by 25%, plus or minus, its recommended weighting. When necessary and/or available, cash flows will be deployed in a manner consistent with rebalancing the asset allocation. In the absence of cash flows, the advisor may effect transactions to rebalance the portfolio. Where a DFA Global Fund is used in a portfolio, rebalancing within the fund will be done automatically. Income tax considerations may be reviewed where appropriate in determining rebalancing activity.

Adjustment in the Target Allocation

The approved asset allocation set out above indicates an initial target allocation for each asset class. From time to time, based on the Investor's changing economic or life circumstances or new academic research, it may be desirable to make changes in the target allocation. Such changes should not, however, be made due to expectations of the relative performance of individual asset classes. The Investor must approve any proposed changes in the form of a written amendment to this IPS.

INVESTMENT STRATEGY AND REVIEW (continued)

Investment Strategy Performance

The Investor recognizes that asset class investment performance is cyclical and, therefore, the Investor may experience periods of time in which investment objectives are not met. In addition, unless there are extenuating circumstances, patience will often prove appropriate when performance has been disappointing for a particular asset class, or the overall portfolio.

For the overall portfolio, the Investor should allow a ten-year time period or longer for achieving the stated investment return objectives. Shorter time frames contradict the principles of long-term investing. Under no circumstances, however, can results be guaranteed.

DUTIES AND RESPONSIBILITIES

The Investor should always be cognizant that they have the ultimate responsibility for the investment of their own assets. The Advisor shall assist Investor to discharge this responsibility with the care, skill, prudence and diligence under the circumstances then prevailing, that a prudent person, acting in a like capacity and familiar with such matters, would use in such conduct with like aims.

Advisor is responsible for assisting the Investor in making an appropriate asset allocation decision based on the particular needs, objectives, and risk profile of the Investor, implementing such decisions, reporting portfolio performance to the Investor and rebalancing the portfolio, as necessary.

Advisor is a Registered Investment Advisor and shall act as the investment advisor to the Investor, pursuant to the Investment Advisory Agreement between the Investor and Advisor.

The Investor should provide Advisor with all relevant information on financial condition, net worth, and risk tolerances and shall notify Advisor promptly of any changes to this information. Failure to disclose all such relevant information will limit advisor's ability to provide prudent investment advice. The Investor's duties, rights, and responsibilities are set forth in the attached Investment Advisory Agreement.

ADOPTION

Investor Signature

Date

Investor Signature

Date

INVESTMENT ACCOUNTS NOT COVERED BY THIS IPS

All accounts for the group except those listed below will be treated as one aggregate portfolio. This should provide the most efficient method (i.e. reduced cost and income tax consequences) for designing and managing the portfolio. In doing so, each account may have different asset class representation and each account's growth may vary over time. This should not detract from the overall investment policy.

See appropriate separate Investment Policy Statement(s) for accounts listed below.

Account Title

Account Number
