

Form 5500 Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Annual Return/Report of Employee Benefit Plan This form is required to be filed for employee benefit plans under sections 104 and 4065 of the Employee Retirement Income Security Act of 1974 (ERISA) and sections 6057(b) and 6058(a) of the Internal Revenue Code (the Code). ▶ Complete all entries in accordance with the instructions to the Form 5500.	OMB Nos. 1210-0110 1210-0089 2022 This Form is Open to Public Inspection
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Part I	Annual Report Identification Information
For calendar plan year 2022 or fiscal plan year beginning 01/01/2022 and ending 12/31/2022	
A	This return/report is for: ☐ a multiemployer plan ☒ a single-employer plan ☐ the first return/report ☐ an amended return/report ☐ a multiple-employer plan (Filers checking this box must attach a list of participating employer information in accordance with the form instructions.) ☐ a DFE (specify) _____ ☒ the final return/report ☐ a short plan year return/report (less than 12 months)
B	This return/report is:
C	If the plan is a collectively-bargained plan, check here. ▶ ☐
D	Check box if filing under: ☐ Form 5558 ☐ automatic extension ☒ the DFVC program ☐ special extension (enter description)
E	If this is a retroactively adopted plan permitted by SECURE Act section 201, check here. ▶ ☐

Part II	Basic Plan Information—enter all requested information		
1a	Name of plan CITADEL RISK MANAGEMENT INC 401(K) PROFIT SHARING PLAN & TRUST	1b	Three-digit plan number (PN) ▶ 001
		1c	Effective date of plan 08/01/2005
2a	Plan sponsor's name (employer, if for a single-employer plan) Mailing address (include room, apt., suite no. and street, or P.O. Box) City or town, state or province, country, and ZIP or foreign postal code (if foreign, see instructions) CITADEL RISK MANAGEMENT INC CRMI 55 LANE RD FAIRFIELD, NJ 07004-1018	2b	Employer Identification Number (EIN) 20-3060884
		2c	Plan Sponsor's telephone number 973-628-6060
		2d	Business code (see instructions) 524150

Caution: A penalty for the late or incomplete filing of this return/report will be assessed unless reasonable cause is established.

Under penalties of perjury and other penalties set forth in the instructions, I declare that I have examined this return/report, including accompanying schedules, statements and attachments, as well as the electronic version of this return/report, and to the best of my knowledge and belief, it is true, correct, and complete.

SIGN HERE	Filed with authorized/valid electronic signature.	09/03/2024	JACK IGNATOWITZ
	Signature of plan administrator	Date	Enter name of individual signing as plan administrator
SIGN HERE			
	Signature of employer/plan sponsor	Date	Enter name of individual signing as employer or plan sponsor
SIGN HERE			
	Signature of DFE	Date	Enter name of individual signing as DFE

3a Plan administrator's name and address ☒ Same as Plan Sponsor		3b Administrator's EIN
		3c Administrator's telephone number
4 If the name and/or EIN of the plan sponsor or the plan name has changed since the last return/report filed for this plan, enter the plan sponsor's name, EIN, the plan name and the plan number from the last return/report: a Sponsor's name c Plan Name		4b EIN 4d PN
5 Total number of participants at the beginning of the plan year		5 45
6 Number of participants as of the end of the plan year unless otherwise stated (welfare plans complete only lines 6a(1) , 6a(2) , 6b , 6c , and 6d).		
a(1) Total number of active participants at the beginning of the plan year		6a(1) 38
a(2) Total number of active participants at the end of the plan year		6a(2) 0
b Retired or separated participants receiving benefits		6b 0
c Other retired or separated participants entitled to future benefits.....		6c 0
d Subtotal. Add lines 6a(2) , 6b , and 6c		6d 0
e Deceased participants whose beneficiaries are receiving or are entitled to receive benefits.		6e 0
f Total. Add lines 6d and 6e		6f 0
g Number of participants with account balances as of the end of the plan year (only defined contribution plans complete this item).....		6g 0
h Number of participants who terminated employment during the plan year with accrued benefits that were less than 100% vested.....		6h 0
7 Enter the total number of employers obligated to contribute to the plan (only multiemployer plans complete this item)		7
8a If the plan provides pension benefits, enter the applicable pension feature codes from the List of Plan Characteristics Codes in the instructions: 2E 2F 2G 2J 2K 2T 3D		
b If the plan provides welfare benefits, enter the applicable welfare feature codes from the List of Plan Characteristics Codes in the instructions:		
9a Plan funding arrangement (check all that apply) (1) ☒ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☐ Trust (4) ☐ General assets of the sponsor		9b Plan benefit arrangement (check all that apply) (1) ☒ Insurance (2) ☐ Code section 412(e)(3) insurance contracts (3) ☐ Trust (4) ☐ General assets of the sponsor
10 Check all applicable boxes in 10a and 10b to indicate which schedules are attached, and, where indicated, enter the number attached. (See instructions)		
a Pension Schedules (1) ☐ R (Retirement Plan Information) (2) ☐ MB (Multiemployer Defined Benefit Plan and Certain Money Purchase Plan Actuarial Information) - signed by the plan actuary (3) ☐ SB (Single-Employer Defined Benefit Plan Actuarial Information) - signed by the plan actuary		b General Schedules (1) ☒ H (Financial Information) (2) ☐ I (Financial Information – Small Plan) (3) ☐ A (Insurance Information) (4) ☐ C (Service Provider Information) (5) ☐ D (DFE/Participating Plan Information) (6) ☐ G (Financial Transaction Schedules)

Part III Form M-1 Compliance Information (to be completed by welfare benefit plans)

11a If the plan provides welfare benefits, was the plan subject to the Form M-1 filing requirements during the plan year? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

If "Yes" is checked, complete lines 11b and 11c.

11b Is the plan currently in compliance with the Form M-1 filing requirements? (See instructions and 29 CFR 2520.101-2.) ☐ Yes ☐ No

11c Enter the Receipt Confirmation Code for the 2022 Form M-1 annual report. If the plan was not required to file the 2022 Form M-1 annual report, enter the Receipt Confirmation Code for the most recent Form M-1 that was required to be filed under the Form M-1 filing requirements. (Failure to enter a valid Receipt Confirmation Code will subject the Form 5500 filing to rejection as incomplete.)

Receipt Confirmation Code _____

SCHEDULE H (Form 5500) Department of the Treasury Internal Revenue Service Department of Labor Employee Benefits Security Administration Pension Benefit Guaranty Corporation	Financial Information This schedule is required to be filed under section 104 of the Employee Retirement Income Security Act of 1974 (ERISA), and section 6058(a) of the Internal Revenue Code (the Code). ► File as an attachment to Form 5500.	OMB No. 1210-0110 2022 This Form is Open to Public Inspection
For calendar plan year 2022 or fiscal plan year beginning <u>01/01/2022</u> and ending <u>12/31/2022</u>		
A Name of plan <u>CITADEL RISK MANAGEMENT INC 401(K) PROFIT SHARING PLAN & TRUST</u>	B Three-digit plan number (PN) ►	<u>001</u>
C Plan sponsor's name as shown on line 2a of Form 5500 <u>CITADEL RISK MANAGEMENT INC</u>	D Employer Identification Number (EIN) <u>20-3060884</u>	

Part I	Asset and Liability Statement		
1 Current value of plan assets and liabilities at the beginning and end of the plan year. Combine the value of plan assets held in more than one trust. Report the value of the plan's interest in a commingled fund containing the assets of more than one plan on a line-by-line basis unless the value is reportable on lines 1c(9) through 1c(14). Do not enter the value of that portion of an insurance contract which guarantees, during this plan year, to pay a specific dollar benefit at a future date. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 1b(1), 1b(2), 1c(8), 1g, 1h, and 1i. CCTs, PSAs, and 103-12 IEs also do not complete lines 1d and 1e. See instructions.			
Assets		(a) Beginning of Year	(b) End of Year
a Total noninterest-bearing cash.....		1a	0
b Receivables (less allowance for doubtful accounts):			
(1) Employer contributions.....		1b(1)	
(2) Participant contributions.....		1b(2)	
(3) Other.....		1b(3)	
c General investments:			
(1) Interest-bearing cash (include money market accounts & certificates of deposit).....		1c(1)	
(2) U.S. Government securities		1c(2)	
(3) Corporate debt instruments (other than employer securities):			
(A) Preferred		1c(3)(A)	
(B) All other		1c(3)(B)	
(4) Corporate stocks (other than employer securities):			
(A) Preferred		1c(4)(A)	
(B) Common.....		1c(4)(B)	4716244
(5) Partnership/joint venture interests		1c(5)	
(6) Real estate (other than employer real property)		1c(6)	
(7) Loans (other than to participants).....		1c(7)	
(8) Participant loans.....		1c(8)	
(9) Value of interest in common/collective trusts.....		1c(9)	
(10) Value of interest in pooled separate accounts		1c(10)	
(11) Value of interest in master trust investment accounts.....		1c(11)	
(12) Value of interest in 103-12 investment entities		1c(12)	
(13) Value of interest in registered investment companies (e.g., mutual funds).....		1c(13)	
(14) Value of funds held in insurance company general account (unallocated contracts).....		1c(14)	
(15) Other		1c(15)	

1d Employer-related investments:		(a) Beginning of Year	(b) End of Year
(1) Employer securities	1d(1)		
(2) Employer real property	1d(2)		
e Buildings and other property used in plan operation	1e		
f Total assets (add all amounts in lines 1a through 1e)	1f	4716244	0

Liabilities

g Benefit claims payable	1g		
h Operating payables	1h		
i Acquisition indebtedness	1i		
j Other liabilities	1j		
k Total liabilities (add all amounts in lines 1g through 1j)	1k	0	0

Net Assets

l Net assets (subtract line 1k from line 1f)	1l	4716244	0
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Part II Income and Expense Statement

2 Plan income, expenses, and changes in net assets for the year. Include all income and expenses of the plan, including any trust(s) or separately maintained fund(s) and any payments/receipts to/from insurance carriers. Round off amounts to the nearest dollar. MTIAs, CCTs, PSAs, and 103-12 IEs do not complete lines 2a, 2b(1)(E), 2e, 2f, and 2g.

Income

		(a) Amount	(b) Total
a Contributions:			
(1) Received or receivable in cash from: (A) Employers	2a(1)(A)	0	
(B) Participants	2a(1)(B)		
(C) Others (including rollovers)	2a(1)(C)		
(2) Noncash contributions	2a(2)		
(3) Total contributions. Add lines 2a(1)(A) , (B) , (C) , and line 2a(2)	2a(3)		0
b Earnings on investments:			
(1) Interest:			
(A) Interest-bearing cash (including money market accounts and certificates of deposit)	2b(1)(A)		
(B) U.S. Government securities	2b(1)(B)		
(C) Corporate debt instruments	2b(1)(C)		
(D) Loans (other than to participants)	2b(1)(D)		
(E) Participant loans	2b(1)(E)		
(F) Other	2b(1)(F)		
(G) Total interest. Add lines 2b(1)(A) through (F)	2b(1)(G)		0
(2) Dividends: (A) Preferred stock	2b(2)(A)		
(B) Common stock	2b(2)(B)	11853	
(C) Registered investment company shares (e.g. mutual funds)	2b(2)(C)		
(D) Total dividends. Add lines 2b(2)(A) , (B) , and (C)	2b(2)(D)		11853
(3) Rents	2b(3)		
(4) Net gain (loss) on sale of assets: (A) Aggregate proceeds	2b(4)(A)	3895882	
(B) Aggregate carrying amount (see instructions)	2b(4)(B)	4561496	
(C) Subtract line 2b(4)(B) from line 2b(4)(A) and enter result	2b(4)(C)		-665614
(5) Unrealized appreciation (depreciation) of assets: (A) Real estate	2b(5)(A)		
(B) Other	2b(5)(B)		
(C) Total unrealized appreciation of assets. Add lines 2b(5)(A) and (B)	2b(5)(C)		0

		(a) Amount	(b) Total
(6) Net investment gain (loss) from common/collective trusts	2b(6)		
(7) Net investment gain (loss) from pooled separate accounts	2b(7)		
(8) Net investment gain (loss) from master trust investment accounts	2b(8)		
(9) Net investment gain (loss) from 103-12 investment entities.....	2b(9)		
(10) Net investment gain (loss) from registered investment companies (e.g., mutual funds)	2b(10)		
c Other income	2c		
d Total income. Add all income amounts in column (b) and enter total	2d		-653761
Expenses			
e Benefit payment and payments to provide benefits:			
(1) Directly to participants or beneficiaries, including direct rollovers	2e(1)		
(2) To insurance carriers for the provision of benefits	2e(2)		
(3) Other	2e(3)		
(4) Total benefit payments. Add lines 2e(1) through (3)	2e(4)		0
f Corrective distributions (see instructions)	2f		
g Certain deemed distributions of participant loans (see instructions)	2g		
h Interest expense	2h		
i Administrative expenses: (1) Professional fees	2i(1)		
(2) Contract administrator fees	2i(2)		
(3) Investment advisory and management fees	2i(3)		
(4) Other	2i(4)		
(5) Total administrative expenses. Add lines 2i(1) through (4)	2i(5)		0
j Total expenses. Add all expense amounts in column (b) and enter total	2j		0
Net Income and Reconciliation			
k Net income (loss). Subtract line 2j from line 2d	2k		-653761
l Transfers of assets:			
(1) To this plan	2l(1)		
(2) From this plan	2l(2)		4062483

Part III Accountant's Opinion

3 Complete lines 3a through 3c if the opinion of an independent qualified public accountant is attached to this Form 5500. Complete line 3d if an opinion is not attached.

a The attached opinion of an independent qualified public accountant for this plan is (see instructions):

(1) ☒ Unmodified (2) ☐ Qualified (3) ☐ Disclaimer (4) ☐ Adverse

b Check the appropriate box(es) to indicate whether the IQPA performed an ERISA section 103(a)(3)(C) audit. Check both boxes (1) and (2) if the audit was performed pursuant to both 29 CFR 2520.103-8 and 29 CFR 2520.103-12(d). Check box (3) if pursuant to neither.

(1) ☐ DOL Regulation 2520.103-8 (2) ☐ DOL Regulation 2520.103-12(d) (3) ☒ neither DOL Regulation 2520.103-8 nor DOL Regulation 2520.103-12(d).

c Enter the name and EIN of the accountant (or accounting firm) below:

(1) Name: **DELOITTE**

(2) EIN: **13-3891517**

d The opinion of an independent qualified public accountant is **not attached** because:

(1) ☐ This form is filed for a CCT, PSA, or MTIA. (2) ☐ It will be attached to the next Form 5500 pursuant to 29 CFR 2520.104-50.

Part IV Compliance Questions

4 CCTs and PSAs do not complete Part IV. MTIAs, 103-12 IEs, and GIAs do not complete lines 4a, 4e, 4f, 4g, 4h, 4k, 4m, 4n, or 5. 103-12 IEs also do not complete lines 4j and 4l. MTIAs also do not complete line 4l.

During the plan year:

a Was there a failure to transmit to the plan any participant contributions within the time period described in 29 CFR 2510.3-102? Continue to answer "Yes" for any prior year failures until fully corrected. (See instructions and DOL's Voluntary Fiduciary Correction Program.)

	Yes	No	Amount
4a		X	

	Yes	No	Amount
b Were any loans by the plan or fixed income obligations due the plan in default as of the close of the plan year or classified during the year as uncollectible? Disregard participant loans secured by participant's account balance. (Attach Schedule G (Form 5500) Part I if "Yes" is checked.)			
4b		X	
c Were any leases to which the plan was a party in default or classified during the year as uncollectible? (Attach Schedule G (Form 5500) Part II if "Yes" is checked.)			
4c		X	
d Were there any nonexempt transactions with any party-in-interest? (Do not include transactions reported on line 4a. Attach Schedule G (Form 5500) Part III if "Yes" is checked.)			
4d		X	
e Was this plan covered by a fidelity bond?	X		500000
f Did the plan have a loss, whether or not reimbursed by the plan's fidelity bond, that was caused by fraud or dishonesty?		X	
4f		X	
g Did the plan hold any assets whose current value was neither readily determinable on an established market nor set by an independent third party appraiser?			
4g		X	
h Did the plan receive any noncash contributions whose value was neither readily determinable on an established market nor set by an independent third party appraiser?			
4h		X	
i Did the plan have assets held for investment? (Attach schedule(s) of assets if "Yes" is checked, and see instructions for format requirements.)			
4i		X	
j Were any plan transactions or series of transactions in excess of 5% of the current value of plan assets? (Attach schedule of transactions if "Yes" is checked and see instructions for format requirements.)	X		
4j	X		
k Were all the plan assets either distributed to participants or beneficiaries, transferred to another plan, or brought under the control of the PBGC?	X		
4k	X		
l Has the plan failed to provide any benefit when due under the plan?		X	
4l		X	
m If this is an individual account plan, was there a blackout period? (See instructions and 29 CFR 2520.101-3.)	X		
4m	X		
n If 4m was answered "Yes," check the "Yes" box if you either provided the required notice or one of the exceptions to providing the notice applied under 29 CFR 2520.101-3.	X		
4n	X		

5a Has a resolution to terminate the plan been adopted during the plan year or any prior plan year? ☒ Yes ☐ No
If "Yes," enter the amount of any plan assets that reverted to the employer this year 0.

5b If, during this plan year, any assets or liabilities were transferred from this plan to another plan(s), identify the plan(s) to which assets or liabilities were transferred. (See instructions.)

5b(1) Name of plan(s)	5b(2) EIN(s)	5b(3) PN(s)
JUSTWORKS RETIREMENT SAVINGS PLAN	46-2283648	333

5c Was the plan a defined benefit plan covered under the PBGC insurance program at any time during this plan year? (See ERISA section 4021 and instructions.) ☐ Yes ☐ No ☒ Not determined
If "Yes" is checked, enter the My PAA confirmation number from the PBGC premium filing for this plan year.



System and Organization Controls Report

Related to Trust and Custody Services
for
Institutional Customers

October 1, 2021 to September 30, 2022

Deloitte.

This report, including the description of tests of controls and results thereof in Section IV, is intended solely for the information and use of management of MATC, user entities of the Service Organization's system related to trust and custody services on the Transaction Network Services ("TNS") platform and related MAC&SC trade settlement, customer receipt, and disbursement processing services for MATC's Institutional Accounts during some or all of the period October 1, 2021 to September 30, 2022, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatement of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.

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Section I: Independent Service Auditor's Report

Section I:

Independent Service Auditor's Report

Mid Atlantic Trust Company
Pittsburgh, PA

Scope

We have examined the description of the system of Mid Atlantic Trust Company (the "Service Organization" or "MATC"), and Mid Atlantic Clearing & Settlement Corporation ("MAC&SC") (collectively, "Mid Atlantic"), wholly owned subsidiaries of Mid Atlantic Capital Group, Inc. (the "Group") for which EdgeCo Holdings ("EdgeCo") is the ultimate parent company, related to trust and custody services on the Transaction Network Services ("TNS") platform and MAC&SC's trade settlement, customer receipt, and disbursement processing services used by MATC to process transactions for MATC's Institutional Accounts throughout the period October 1, 2021 to September 30, 2022 (the "Description") and the suitability of the design and operating effectiveness of controls included in the Description to achieve the related control objectives also included in the Description, based on the criteria identified in Section II (the "Assertions"). The controls and control objectives included in the Description are those that management of Mid Atlantic believes are likely to be relevant to user entities' internal control over financial reporting and the Description does not include those aspects of the system of Mid Atlantic that are not likely to be relevant to user entities' internal control over financial reporting.

The information in Section V, "Other Information Provided by the Service Organization" that describes the Service Organization's Management Response to Testing Exception, Encryption, Business Continuity and Disaster Recovery, Privacy Program, Corporation Records Management, Anti-Money Laundering Certification, QTA & Force Outs and COVID Pandemic Response is presented by management of the Service Organization to provide additional information and is not a part of the Service Organization's description of its system made available to user entities during the period October 1, 2021 to September 30, 2022. Information about the Service Organization's Management Response to Testing Exception, Encryption, Business Continuity and Disaster Recovery, Privacy Program, Corporation Records Management, Anti-Money Laundering Certification, QTA & Force Outs and COVID Pandemic Response has not been subjected to the procedures applied in the examination of the description of the system and of the suitability of the design and operating effectiveness of controls to achieve the related control objectives stated in the description of the system and, accordingly, we express no opinion on it.

MAC&SC is a subservice organization that provides trade settlement, customer receipt, and disbursement processing services to MATC ("MAC&SC's System"). The Description includes a description of MAC&SC's Systems used by MATC to process transactions for MATC's user entities, including relevant control objectives and controls of MAC&SC.

The Service Organization uses EdgeCo Holdings for infrastructure management and Broadridge Investor Communication Solutions for proxy voting and distribution (collectively, "subservice organizations"). The Description in Section III includes only the controls and related control objectives of the Service Organization and excludes the control objectives and related controls of the subservice organizations. The description also indicates that certain control objectives specified by MATC can be achieved only if complementary subservice organization controls assumed in the design of the Service Organization's controls are suitably designed and operating effectively, along with the related controls at Mid Atlantic. Our examination did not extend to controls of the subservice organizations or their functions, and we have not evaluated the suitability of the design or

operating effectiveness of such complementary subservice organization controls.

The Description indicates that certain control objectives specified in the Description can be achieved only if complementary user entity controls contemplated in the design of the Service Organization's controls are suitably designed and operating effectively, along with related controls at the Service Organization. Our examination did not extend to such complementary user entity controls and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Service Organization's Responsibilities

In Section II, MATC and MAC&SC have provided their assertions about the fairness of the presentation of the Description and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the Description. MATC and MAC&SC are responsible for preparing the Description and its assertions, including the completeness, accuracy, and method of presentation of the Description and the assertion, providing the services covered by the Description, specifying the control objectives and stating them in the Description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the assertion, and designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the Description.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the Description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the Description, based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants ("AICPA"). Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, based on the criteria in managements' assertions, the Description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the Description throughout the period October 1, 2021 to September 30, 2022. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

An examination of a description of Mid Atlantic's system and the suitability of the design and operating effectiveness of controls involves:

- Performing procedures to obtain evidence about the fairness of the presentation of the Description and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on the criteria in managements' assertions.
- Assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the Description.
- Testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the related control objectives stated in the Description were achieved.
- Evaluating the overall presentation of the Description, suitability of the control objectives stated therein, and suitability of the criteria specified by the service organization in its assertion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements related to the examination engagement.

Inherent Limitations

The Description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' financial statements and may not, therefore, include every aspect of the system that each individual user entity may consider important in its own particular environment. Because of their nature, controls at a service organization may not prevent, or detect and correct, all misstatements in processing or reporting transactions. Also, the projection to the future of any evaluation of the fairness of the presentation of the Description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives, is subject to the risk that controls at a service organization may become ineffective.

Description of Tests of Controls

The specific controls tested and the nature, timing, and results of those tests are listed in Section IV of the report.

Opinion

In our opinion, in all material respects, based on the criteria described in MATC's and MAC&SC's assertions in Section II of the report:

- a. The Description fairly presents MATC's system related to trust and custody services on the Transaction Network Services ("TNS") platform and MAC&SC's trade settlement, customer receipt, and disbursement processing services used by MATC to process transactions for MATC's Institutional Accounts that were designed and implemented throughout the period October 1, 2021 to September 30, 2022.
- b. The controls related to the control objectives stated in the Description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period October 1, 2021 to September 30, 2022, and subservice organizations and user entities applied the complementary controls assumed in the design of Mid Atlantic's controls throughout the period October 1, 2021 to September 30, 2022.
- c. The controls operated effectively to provide reasonable assurance that the control objectives stated in the Description were achieved, throughout the period October 1, 2021 to September 30, 2022 if complementary subservice organization controls and complementary user entity controls assumed in the design of Mid Atlantic's controls operated effectively throughout the period October 1, 2021 to September 30, 2022.

Restricted Use

This report, including the description of tests of controls and results in Section IV, is intended solely for the information and use of management of the Service Organization, user entities of the Service Organization's system related to trust and custody services on the Transaction Network Services ("TNS") platform and MAC&SC's trade settlement, customer receipt, and disbursement processing services used by MATC to process transactions for MATC's Institutional Accounts during some or all of the period October 1, 2021 to September 30, 2022, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information including information about controls implemented by user entities themselves, when assessing the risks of material misstatement of user entities' financial statements. This report is not intended to be and should not be used by anyone other than these specified parties.



January 27, 2023

Section II: Managements' Assertions Provided by Mid Atlantic



South Dakota Office
330 S. Poplar Ave, Suite 103-E
Pierre, SD 57501

Pittsburgh Office
1251 Waterfront Place, Suite 525
Pittsburgh, PA 15222

(800) 693-7800
www.macg.com

MID ATLANTIC TRUST COMPANY'S ("MATC") MANAGEMENT ASSERTION Examination Period From October 1, 2021 to September 30, 2022

We have prepared the description of the system of Mid Atlantic Trust Company ("MATC") relating to trust and custody services on the Transaction Network Services ("TNS") platform and Mid Atlantic Clearing & Settlement Corporation's ("MAC&SC") trade settlement, customer receipt, and disbursement processing services used by MATC to process transactions for MATC's Institutional Accounts ("Description") for user entities during some or all of the period October 1, 2021 to September 30, 2022, and their user auditors who have a sufficient understanding to consider it, along with other information, including information about controls implemented by user entities of the system themselves, when assessing the risks of material misstatements of user entities' financial statements.

MATC uses MAC&SC, a wholly-owned subservice organization, to provide trade settlement, customer receipt, and disbursement processing. The description includes a description of MAC&SC's trade settlement, customer receipt, and disbursement processing services used by MATC to process transactions for MATC's user entities, including controls relevant to the control objectives stated in the description. MAC&SC's Management Assertion is presented in Section II.

MATC uses EdgeCo Holdings for infrastructure management and Broadridge Investor Communication Solutions for proxy voting and distribution (collectively, "subservice organizations"). The description includes only the control objectives and related controls of MATC and excludes the control objectives and related controls of the subservice organizations. The description also indicates that certain control objectives specified by MATC can be achieved only if complementary subservice organization controls assumed in the design of MATC's controls are suitably designed and operating effectively, along with the related controls at Mid Atlantic. The description does not extend to controls of the subservice organizations.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Mid Atlantic's controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.

Description Criteria

We confirm, to the best of our knowledge and belief, that:

1. The description fairly presents the trust and custody services on the Transaction Network Services ("TNS") platform and MAC&SC's trade settlement, customer receipt, and disbursement processing services used by MATC to process transactions for MATC's Institutional Accounts made available to user entities of the system during some or all of the period October 1, 2021 to September 30, 2022 for processing their transactions. The criteria we used in making this assertion were that the description:
 - a. Presents how the system made available to user entities was designed and implemented to process relevant transactions, including, if applicable:
 - i. The types of services provided including, as appropriate, the classes of transactions processed.

- ii. The procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for MATC's user entities of the system.
 - iii. The information used in the performance of procedures, including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for MATC's user entities.
 - iv. How the system captures and addresses significant events and conditions.
 - v. The process used to prepare reports or other information provided to user entities of the system.
 - vi. Services performed by a subservice organization, if any, including whether the carve-out method or the inclusive method has been used in relation to them.
 - vii. The specified control objectives and controls designed to achieve those objectives, including, as applicable, complementary user entity controls assumed in the design of the service organization's controls.
 - viii. Other aspects of our control environment, risk assessment process, information and communications (including the related business processes), control activities, and monitoring activities that are relevant to the services provided.
- b. The description includes relevant details of changes to MATC's system during the period covered by the description when the description covers a period of time.
 - c. The description does not omit or distort information relevant to the service organization's system, while acknowledging that the description is prepared to meet the common needs of a broad range of user entities of the system and their user auditors and may not, therefore, include every aspect of the system that each individual user entity of the system and its auditor may consider important in its own particular environment.
2. The controls related to the control objectives stated in the description were suitably designed and operated effectively throughout the period October 1, 2021 to September 30, 2022 to achieve those control objectives provided that subservice organizations and user entities applied the controls contemplated in the design of Mid Atlantic's controls. The criteria we used in making this assertion were that:
- a. The risks that threaten the achievement of the control objectives stated in the description have been identified by MATC.
 - b. Controls identified in our description would, if operating as described, provide reasonable assurance that those risks would not prevent the control objectives stated in our description from being achieved.
 - c. The controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.



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MID ATLANTIC CLEARING & SETTLEMENT CORPORATION'S ("MAC&SC") MANAGEMENT ASSERTION

Examination Period From October 1, 2021 to September 30, 2022

Mid Atlantic Clearing & Settlement Corporation ("MAC&SC") provides trade settlement, customer receipt, and disbursement processing services to Mid Atlantic Trust Company ("MATC"). MAC&SC is wholly owned by MATC. The services provided by MAC&SC are part of MATC's trust and custody services on the TNS platform for MATC's Institutional Accounts. We are responsible for the description of MAC&SC's trade settlement, customer receipt, and disbursement processing services provided to MATC and user entities of MATC's trust and custody services on the TNS platform for MATC's Institutional Accounts, which is included in "Description of the System Provided by Mid Atlantic" for processing user entities' transactions throughout the period October 1, 2021 to September 30, 2022, (description) for user entities of the system during some or all of the period October 1, 2021 to September 30, 2022, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information, including information about controls implemented by user entities of the system themselves, when assessing the risks of material misstatement of user entities' financial statements.

Description Criteria

We confirm, to the best of our knowledge and belief, that:

1. The description fairly presents MAC&SC's trade settlement, customer receipt, and disbursement processing services made available to MATC's user entities of the system during some or all of the period October 1, 2021 to September 30, 2022 for processing their transactions. The criteria we used in making this assertion were that the description:
 - a. Presents how the trade settlement, customer receipt, and disbursement processing services made available to user entities of MATC was designed and implemented to process relevant transactions, including, if applicable:
 - i. The types of services provided by MAC&SC including, as appropriate, the classes of transactions processed.
 - ii. The procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for MATC's user entities of the system.
 - iii. The information used in the performance of MAC&SC's procedures, including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for MATC's user entities.
 - iv. How the system captures and addresses significant events and conditions.
 - v. The process used to prepare reports or other information provided to user entities of the system.
 - vi. Services performed by a subservice organization, if any, including whether the carve-out method or the inclusive method has been used in relation to them.

- vii. The specified control objectives and controls designed to achieve those objectives, including, as applicable, complementary user entity controls assumed in the design of the service organization's controls.
 - viii. Other aspects of our control environment, risk assessment process, information and communications (including the related business processes), control activities, and monitoring activities that are relevant to the services provided.
 - b. The description includes relevant details of changes to MAC&SC's system during the period covered by the description when the description covers a period of time.
 - c. The description does not omit or distort information relevant to MAC&SC's system, while acknowledging that the description is prepared to meet the common needs of a broad range of MATC's user entities of the system and their user auditors and may not, therefore, include every aspect of the system that each individual user entity of the system and its auditor may consider important in its own particular environment.
2. MAC&SC's controls related to the control objectives stated in the description were suitably designed and operated effectively throughout the period October 1, 2021 to September 30, 2022 to achieve those control objectives provided that subservice organizations and MATC's user entities applied the controls contemplated in the design of Mid Atlantic's controls. The criteria we used in making this assertion were that:
- a. MAC&SC's controls were consistently applied as described, including whether manual controls were applied by individuals who have the appropriate competence and authority.

Section III: Description of the System Provided by Mid Atlantic

Section III:

Description of the System Provided by Mid Atlantic

I. Overview of Mid Atlantic Trust Company

Mid Atlantic Trust Company ("MATC", the "Company" or "Service Organization") is a South Dakota chartered non-depository trust organization that provides directed trustee, custody, sub-custody, recordkeeping or paying agent services for its institutional customers, which include institutional investors, financial institutions, trust companies, and pension trusts (collectively, "Institutional Customers" or "Institutional Accounts").

Mid Atlantic Trust Company was established in 2010 and is a wholly owned subsidiary of Mid Atlantic Capital Group (the "Group") for which EdgeCo Holdings ("EdgeCo") is the ultimate parent company.

The company maintains offices in Pittsburgh, Pennsylvania and Pierre, South Dakota, but has a nationwide customer base that includes institutional, corporate, and individual investors.

MATC is a member of the Depository Trust & Clearing Corporation ("DTCC") for performance of Customer Account Transfer ("ACAT") transfers.

Mid Atlantic Clearing and Settlement Corporation ("MAC&SC") is wholly owned by MATC and is utilized for mutual fund trading. MAC&SC is a FINRA registered broker-dealer.

MAC&SC is a member of the National Securities Clearing Corporation ("NSCC"), a subsidiary of The Depository Trust & Clearing Corporation. The NSCC is the main provider of centralized information services and money settlement for mutual fund transactions, linking funds with their broker-dealer, bank, and financial planner distribution channels. MAC&SC enters into and maintains mutual fund selling and servicing agreements for the funds that are offered to the customers of MATC. As a result of those agreements, MAC&SC also receives and provides cashiering services for mutual fund fees such as 12b-1 trails, finder's fees, and service/sub transfer agency fees.

MATC utilizes National Financial Services, LLC of FMR Corp. ("NFS"), a member of the New York Stock Exchange, Inc. on a fully disclosed basis in connection with the execution and clearance of certain securities transactions effected by MATC and its customers. These services are not covered under the scope of this report. MATC's affiliate, NewEdge Securities, Inc, is a correspondent firm of NFS.

MAC&SC also serves as clearing broker for certain institutional customers, primarily regulated financial institutions, referred by FIS Brokerage & Securities Services LLC ("FIS") and subject to a Servicing Agreement with MATC. MAC&SC uses TNS as its custody platform for this business. MAC&SC acts exclusively as trading agent on behalf of these Customers and only maintains temporary custody of cash pending trade settlement. Therefore, MAC&SC establishes omnibus settlement accounts on TNS.

MATC uses EdgeCo's Infrastructure Services, Enterprise Information Technology ("EIT"), as a subservice organization for general computer control services. Mid Atlantic relies on the controls performed by EIT to achieve stated control objectives in Section IV of this report. The controls performed by EIT relate to logical and physical security over MATC related applications and systems, application and system processing, and change management. These controls are included in a separate System and Organization Controls Report entitled EdgeCo Holdings, LLC Enterprise Information Technology Controls for the period of October 1, 2021 to September 30, 2022. The clients of MATC and their auditors should review EdgeCo's System and Organization Controls Report in conjunction with this report to gain a full understanding of Mid Atlantic's system.

Trust and Custody Platform

MATC's services are supported by the Transaction Network Services system ("TNS"), a proprietary web-based, real-time recordkeeping, trust and custody reporting system.

Customers and Accounts

For the purposes of this report, MATC customers ("Customers") include:

- Third-party administrators and record keepers, primarily with respect to company retirement plan accounts; and
- Banks, trust companies, and other financial institutions primarily in the role of sub-custodian to provide trade routing services.

Customers of MATC provide services to various clientele, primarily, company sponsored retirement plans, but also a small population of individual retirement accounts ("IRA"s) and non-retirement accounts ("Registered Account Holder", "Clients"). The Customer outsources custody, trading, cashiering, and/or reporting services to MATC. In order to perform these services, MATC establishes an account (BIN) on TNS. Accounts are used to report, record and monitor assets and transactional activity of each Client.

The registered account owner is an individual or group of individuals who, either directly or indirectly, have the power to vote or influence the transaction decisions regarding a specific account. For company sponsored retirement plans, the company sponsor is the registered account owner required to enter into account level agreements with MATC. For individual accounts, the individual(s) whose name appears on the account is the registered account owner(s).

MATC Capacity

MATC may function in one of the following capacities based on agreed upon terms:

- *Custodian:* MATC is responsible for holding Client securities in physical or electronic form and provides credit income processing and corporate action services in the event of a merger, acquisition, or other activity that affects a security. MATC uses third party service organizations for street-side custody (e.g., mutual fund companies, banks, and other financial institutions). When named as custodian, assets held street-side are registered in MATC's tax identification number and are titled "MATC FBO" the account owner.
- *Sub-custodian:* Same as with Custodial services above, however MATC is not directly contracted with the beneficial owners. Under this construct, MATC has a master agreement with the custodian. When named as sub-custodian, assets held street-side are registered in MATC's tax identification number and are titled "MATC FBO" the custodian.
- *Directed Trustee:* MATC serves either as custodian or sub-custodian. Asset titling is consistent with custodial services. The plan sponsor signs a special directed trustee agreement with MATC. MATC serves as directed trustee only on ERISA accounts. As directed trustee, MATC certifies the annual account statement to enable the retirement plan to undergo a limited scope audit. MATC provides an additional level of oversight and review to directed trustee plans consistent with industry leading practices.
- *Reporting Only:* MATC is neither the custodian nor sub-custodian but is engaged to perform trading and/or consolidated plan level reporting. Assets are titled directly to the account owner as self-trusteed accounts. This service was offered to a select group of legacy customers under limited circumstances. MATC is converting existing reporting only clients to custody in collaboration with the servicing record-keepers.
- *Paying Agent:* MATC either serves as custodian or sub-custodian of a retirement plan's cash. MATC is engaged to perform participant level distribution processing and tax reporting. A paying agent account is established to hold cash pending distribution. Paying agent accounts may not hold non-cash investment options. No investment transactions occur in paying agent accounts.

Services Provided by Mid Atlantic Clearing & Settlement Corporation ("MAC&SC")

MATC uses MAC&SC as a subservice organization for trade settlement, customer receipt, and disbursement processing services. The description includes the control objectives and related controls of MATC and the control objectives and related controls of MAC&SC. The term "Mid Atlantic" used throughout this report refers to MATC and MAC&SC collectively.

II. Scope of the Description

The control objectives specified by Mid Atlantic and the controls that achieve those control objectives are listed in the accompanying Section IV. The description that follows outlines the infrastructure and business processes and controls that are performed by Mid Atlantic for its Customers. This should be read in connection with the control objectives and control activities described in Section IV that are intended to be incorporated herein by reference.

This report does not cover the following:

- Mid Atlantic Capital Group or any of its other wholly owned subsidiaries or related parties.
- Self-Directed Brokerage Account linked to retirement plans on the TNS platform, regardless of custodian.

SSAE 18 Standards

This report has been prepared taking into consideration the guidance contained in the American Institute of Certified Public Accountants' ("AICPA") Statement on Standards for Attestation Engagements No. 18, Attestation Standards: Clarification and Recodification ("SSAE 18").

Subservice Organizations and Vendors and Complementary Subservice Organization Controls

Mid Atlantic utilizes subservice organizations to provide services relating to the control objectives in Section IV of this report, in support of its trust and custody services. The activities performed by these external subservice organizations are required to meet the assertions specified in the control objectives. In addition, Mid Atlantic assesses the risks associated with these subservice organizations and has implemented various management oversight and monitoring processes to evaluate that the subservice organizations continue to provide these services in a controlled manner.

Inclusive Method

MATC uses MAC&SC as a subservice organization for trade settlement and for customer receipt and disbursement processing. The description includes the control objectives and related controls of MAC&SC.

Carve-Out Method

The scope of this report does not include control objectives and controls at the subservice organizations set forth in the below. User entities should evaluate and perform the necessary procedures related to the activities performed by the following subservice organizations accordingly.

Information Technology Services

MATC uses EdgeCo's Enterprise Information Technology ("EIT") as a subservice organization for general computer control services. EdgeCo provides IT managed services including access security management, infrastructure management, IT operations management, physical security, and IT support for MATC. MATC's Information Technology controls are covered in a separate SOC1 report that is issued for EdgeCo Enterprise Information Technology.

Broadridge Investor Communication Solutions

MATC uses Broadridge Investor Communication Solutions ("Broadridge") to support proxy voting and distribution for MATC accounts. MATC uses the ProxyEdge interface to send account holder information to Broadridge for electronic voting of proxies and distribution to self-voting accounts.

Mid Atlantic Management and the EdgeCo Risk and Corporate Compliance department of Mid Atlantic obtains and reviews the SOC report on an annual basis. In addition, through its daily operational activities, management monitors the services provided to ensure that operations and controls expected to be implemented at the subservice organization are operating as intended.

Vendor Relationships

For the purposes of this report, other third parties that provide services to Mid Atlantic that are not considered subservice organizations are referred to as vendors. As Mid Atlantic's controls alone are sufficient to meet the needs of user entity's internal control over financial reporting (that is, achievement of the control objectives in Section IV are not dependent on the service providers' controls), management has concluded that the entity is not a subservice organization. Therefore, these service providers are classified as vendors and the scope of the report does not include controls and related control objectives. Mid Atlantic uses the following vendors in the table below to support the specified functions related to the control objectives in Section IV of this report. However, the activities performed by these vendors are not required to meet the assertions specified in the control objectives, and as a result, no additional procedures are required to be evaluated related to the activities of these vendors.

Vendor	Description of Service(s) Provided
Adobe Sign	Provider of electronic signature services for execution of MATC's custody agreements, unitization agreement, and other documents Adobe sign is a Web 2.0 electronic signature and enterprise content management system with specific focus on the document management and verification lifecycle. Details of Adobe's compliance with ESIGN and UETA regulations are found on their website.
Bloomberg L.P.	Data provider used by MAC&SC to provide MATC with prices and accrual factors for fixed income and pink sheet equity securities.
DTCC/NSCC/FundSERV	Depository Trust & Clearing Corporation's ("DTCC") Wealth Management platform, the National Securities Clearing Corporation ("NSCC"), provides trading, clearing, and settlement services for mutual fund companies and intermediaries. MAC&SC is a limited member firm of the NSCC. NSCC facilitates transmission of trade orders to funds, and the return of confirmations, prices, positions, and dividends to firms. NSCC also provides net settlement services and processing of commission payments.
Mergent, Inc.	Data provider of corporate actions and distribution announcements for mutual funds and equities. Mid Atlantic utilizes the electronic data files for processing of dividend allocations.

Vendor	Description of Service(s) Provided
Morningstar, Inc.	Data provider of mutual fund performance and operational data. Electronic files are loaded into TNS for support of fund research by broker, advisors, record keepers, and other authorized parties. Morningstar information is used in the production of fee disclosure notices to plan sponsors. Mid Atlantic is a licensed reseller of Morningstar data to record keepers.
Risk Compliance Performance ("RCP") Solutions	Service provider contracted to assist in the research and location of uncashed check owners of plans and accounts serviced by Mid Atlantic. RCP contacts the check owners directly so the participant can request that a check be reissued by Mid Atlantic.
SS&C Technologies, Inc.	Technology provider used by MAC&SC to receive equity orders from Mid Atlantic to send to executing brokers (Citadel Securities). The connection is also used to retrieve closing prices of equity securities.
Sub- Custodian Relationships	Cash The Company uses well capitalized banks and other financial institutions to custody customer uninvested cash. The Company's main processing accounts, accounts established to receive deposits and process distributions, are maintained at Huntington National Bank (headquartered in Columbus, Ohio), Tri-State Capital Bank (headquartered in Pittsburgh, Pennsylvania) and PNC Bank (headquartered in Pittsburgh, Pennsylvania). ETFs and Other Securities The Company maintains an omnibus prime brokerage account at National Financial Services LLC, a single member limited liability company wholly owned by Fidelity Global Brokerage Group, Inc., a wholly owned subsidiary of FRM LLC, for the settlement and custody of customer ETFs and securities, other than mutual funds. NFS also provides data on corporate actions.
NewEdge Securities	Executes trades for ETF products on behalf of MATC. MACC name was changed to NewEdge Securities, Inc. as of 11/1/2021, no change in ownership or control.

III. Control Framework

Mid Atlantic's control framework consists of the following components which form an integrated system that provides information to management which enables proactive responses to changing business conditions.

Control Environment

The control environment sets the tone of an organization, influencing the control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure.

The Company's business is built on a foundation of ethics and integrity. To help ensure that the business at Mid Atlantic is conducted in an ethical and compliant manner, a corporate governance structure, headed by Mid Atlantic's Board of Directors, has been developed. The Board of Directors and management consist of individuals with depth and breadth of business experience. They offer a wide diversity of opinion, and a deep understanding of the Company's mission and vision.

The Company operates in a highly regulated industry where risk management, control and reputation are critical. The Group maintains enterprise-wide and Company specific policies and programs to promote an appropriate control environment.

In addition to the Mid Atlantic Board of Directors, EdgeCo Holdings has its own Board of Directors. Human Resources is managed at the EdgeCo level to provide a consistent set of policies, procedures, and services across all EdgeCo affiliates. The employment manual in use is issued by EdgeCo Holdings and all employees have signed and attested to EdgeCo policies and procedures.

The primary elements of Mid Atlantic's internal control environment, including the extent to which each element is addressed, are described below.

- Communication and Enforcement of Integrity and Ethical Values
- Commitment to Competence
- Participation by Those Charged with Governance
- Management's Philosophy and Operating Style
- Organization Structure and Assignment of Authority and Responsibility
- Human Resources Policies and Practices
- Risk Assessment Process
- Control Activities
- Information and Communication
- Monitoring Activities

Communication and Enforcement of Integrity and Ethical Values

Mid Atlantic offers its employees a number of channels through which to report ethical breaches. Employees are encouraged to review their concerns with or seek guidance from their manager or applicable department within Mid Atlantic, such as Compliance or Human Resources. Reports are investigated by persons based on the nature of the complaint, such as Compliance, Human Resources, or an internal security representative.

Mid Atlantic requires employees to acknowledge their receipt and understanding of certain policies upon hire then annually thereafter, as applicable, including but not limited to:

a. Employee Handbook

The employee handbook includes information about EdgeCo's mission and purpose, values, and culture, along with expectations about conduct and discipline policies and rules concerning mail, company equipment, and internet and email.

b. *The Code of Ethics and Business Conduct*

The cornerstone of ethics and compliance at EdgeCo is the Code of Ethics which provides guidance towards reaching decisions that are legal and ethical and informs employees of ways to find more information when they need it.

c. *Conflict of Interest*

EdgeCo has a formal conflict-of-interest policy that, among other things, reminds employees to place the interests of EdgeCo and its Customers ahead of their personal interests or those of their immediate family members. Employees are required to disclose situations that may create an actual or potential conflict, or even the appearance of a conflict, between EdgeCo's interests and their personal interests or those of their immediate family members regardless of whether they occur at work or in their personal life, and conflicts of interest are required to be disclosed and addressed under this policy.

d. *Employee Confidentiality Agreement*

Upon hire, employees are required to sign a confidentially agreement acknowledging that they are prohibited from disclosing company confidential and proprietary information for the duration of the employee's employment and for a period of time following employee termination.

e. *Cyber Security – Data Privacy Policy*

This policy informs employees of their obligatory requirements for protecting EdgeCo's technology and information assets.

f. *Electronic Communications, Social Media, and System Usage*

This policy provides guidance and requirements to employees on communicating electronically through EdgeCo devices, networks, systems, application and through third-party or internet services. This policy focuses on how to protect EdgeCo's clients, systems, information, and reputation when communicating electronically. It includes sections on business and personal use of social media, storing information, and use of personal devices for business. It establishes that EdgeCo's devices, networks, applications, and/or systems are required to be used for business purposes, but that incidental and occasional non-business use is acceptable. By using EdgeCo's devices, networks, application or systems, employees agree to comply with the policy and its requirements. EdgeCo monitors usage and has the right to access, copy, retain, or delete information or communications stored or transmitted through either EdgeCo-owned or personally-owned devices that are related to EdgeCo's business.

Commitment to Competence

Mid Atlantic and EdgeCo are committed to employee competence that begins with formal hiring practices designed to ensure that new employees are qualified for their job responsibilities. Hiring policies include requiring employees have minimum educational and experience requirements. Mid Atlantic and EdgeCo also perform criminal and financial background investigations on potential employees.

Training of personnel is accomplished through supervised on-the-job training, outside seminars, and in-house meetings. Managers are responsible for encouraging the training and development of employees so personnel continue to qualify for their functioning responsibilities.

Managers evaluate employee performance against certain performance criteria throughout the month. The Board of Directors evaluates overall company performance on a quarterly basis and formal performance reviews are conducted on an annual basis.

To help ensure employees and subcontractors deliver high quality services, the Company has implemented a number of tools, such as policies and procedures relating to applicable business practices and compliance, training and communication, maintaining and improving knowledge and experience, allocating resources, or clear job responsibilities and duties. In addition, management communicates regularly with employees to ensure

that employees understand the Company's goals and objectives and how their individual actions interrelate and contribute to those objectives and the results.

Participation by Those Charged with Governance

Mid Atlantic's and EdgeCo's commitment to an effective system of controls starts with the Board of Directors. Additionally, the Audit Committee, which includes several members of the Board of Directors, meets at least annually, and otherwise as deemed necessary to fulfill its oversight responsibilities for the financial reporting process, the system of internal controls, internal and independent audit activities and the Group's process for managing risk and monitoring compliance with laws and regulations. Mid Atlantic's senior officers meet periodically, as well, to oversee critical business operations.

Internal Audit provides independent audit services to help the Group manage risk. Internal Audit follows a risk-based audit approach, which includes (1) assessing the adequacy and effectiveness of internal controls, risk management, compliance, and governance process; (2) reporting issues and solutions that improve the control environment, (3) responding to change with a sense of urgency through continuous risk assessment and resource allocation, (4) follow-up on significant issues requiring management attention, and (5) providing audit and advisory services on new and changing products and services. Internal audit reports to the Audit Committee of the Board of Directors.

In addition to Internal Audit, Mid Atlantic has other corporate functions dedicated to effective risk management and oversight including Compliance Departments and a Risk Committee.

Compliance Departments: The Group maintains two compliance departments, one for broker-dealer and registered investment advisor oversight and one for trust company oversight. The Chief Compliance Officers ensure personnel and operations meet relevant regulatory requirements.

Risk Committee: The Risk Committee takes the lead role in assessing the risk landscape across the Group. The committee is comprised of senior management across departments. The committee considers the business from a risk-based point of view to identify potential risks and assess the adequacy of the controls designed to mitigate those risks, including those which require action and/or monitoring.

Management's Philosophy and Operating Style

Management's philosophy and operating style significantly affects the way the company is run including the types of business risks it accepts. Management firmly believes it is an essential part of the corporate identity that employees act ethically and maintain compliance with applicable statutes, regulations, and professional standards. The Group values honesty and truthfulness in communications to its shareholders, customers, the general public, regulatory agencies and employees. To emphasize the importance of ethics, values and commitment to integrity, the Group maintains and monitors policies relating to employee conduct.

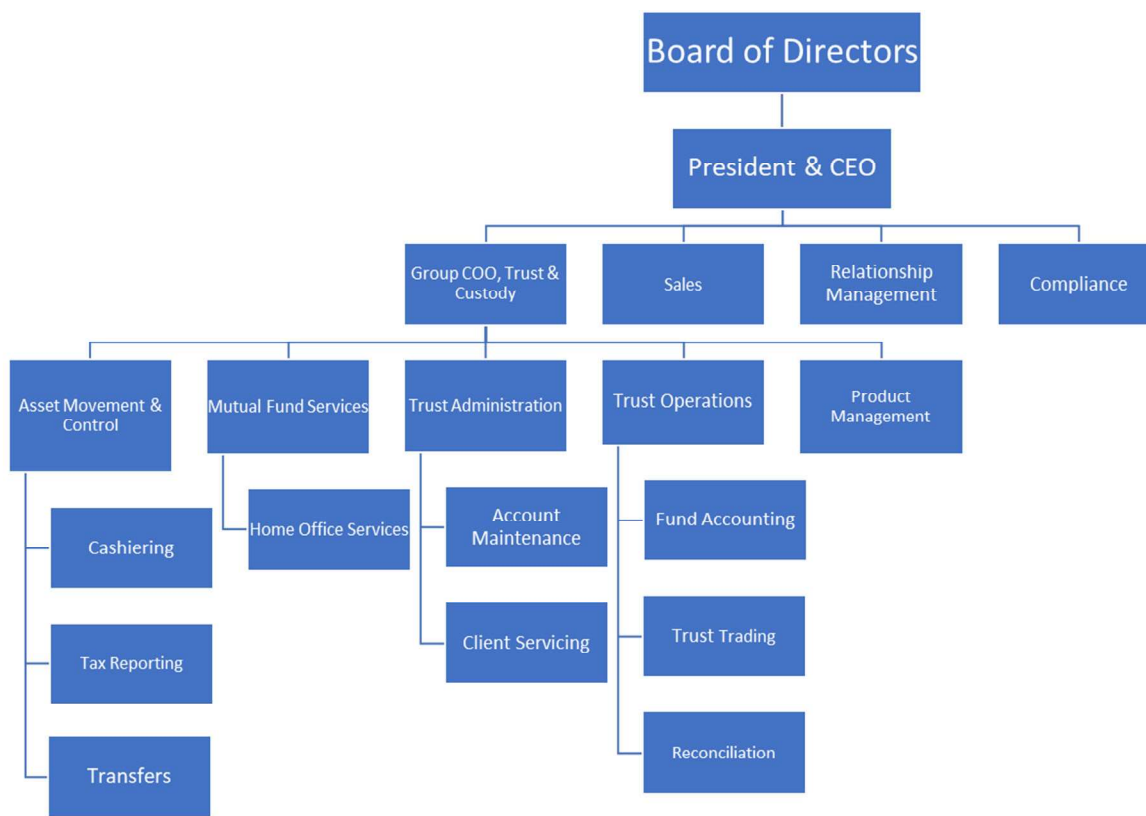
Frequent management meetings are held to discuss business initiatives, special projects, operational performance, development and maintenance projects in process, and to continually identify, assess and monitor risks.

Organization Structure and Assignment of Authority and Responsibility

The Company's organizational structure provides the framework for planning, directing, managing and monitoring its operations in order to effectively service its customers and achieve its corporate objectives. The key areas of authority and responsibility, as well as applicable lines of reporting, are reflected in the Company's organizational structure.

The organization structure described below details the departments that provide for the institutional trust and custody services for MATC clients and includes the departments within MAC&SC that support those services. The organizational structure strives to provide for segregation of duties as well as clearly defined areas of responsibility.

Organization Structure



Department	Responsibilities
Sales and Relationship Management ("RM")	Facilitates pre-acceptance Customer due diligence process by obtaining a completed questionnaire and other required documents to enable Corporate Compliance and management to complete the due diligence review. On-boards approved new Customers which includes obtaining the fully executed Mid Atlantic TNS Access Agreement and other customer level agreements.
Operations – Trust Services ("TS")	Assists Customers with establishing Client accounts and subsequent maintenance requests. Monitors the new account set up process through the use of Taskmaster, an automated workflow tracking mechanism within TNS that required account opening procedures have been completed before an account is "open" and authorized to trade or process cashiering requests. Performs a post-setup verification to ensure all required paperwork has been obtained and properly executed and account coding is appropriate. Provides ongoing customer support.

Department	Responsibilities
Fund Services ("FS")	Liaison between Mid Atlantic and mutual fund companies for contractual agreements, ongoing compliance and relationship matters. Monitors compliance with fund contract provisions. Fee calculation and fund company invoicing. TNS security master database maintenance, primarily mutual funds but assists with other security maintenance.
Advisor Services ("AS")	Exchange traded product ("ETP") security master maintenance. Facilitates pre-acceptance model manager (for unitized funds) due diligence process by obtaining a completed questionnaire and other required documents to enable Corporate Compliance and management to complete the due diligence review. On-boards approved new model managers which includes obtaining the fully executed agreements. Provides ongoing model manager support.
Trust Trading ("TT")	Liaison between execution venues and NSCC, monitors automated trading lines to exchanges and NSCC, supports Customers during system failures, authenticates the accuracy of execution prices and the validity of unexecuted orders. Settlement: Reconciles trade breaks and transactions processed between Mid Atlantic and clearing firms. Processes trade corrections and market actions. Pricing: Responsible for monitoring incoming price files, manually entering prices, and reviewing variance reports. Corporate actions: Ensures TNS is updated for mandatory corporate action events.
Reconciliation (Recon)	Performs various reconciliations between custodian accounts, external mutual fund and other custodian accounts, and sub-account positions. Facilitates the timely resolution of exception items identified within the reconciliations to provide accurate and timely statement publishing.
Asset Movement and Control ("AMC")	Cash movement: Processes account level receipts and distribution requests. Supervises the execution of monetary payments through Fed Wire, ACH and checks and intra-bank payments. Settlement: Monitors receipt of net settlement amounts due to/from Customers and settlement agents (NSCC and NFS) on settlement date. Transfers: primary owner of NSCC B52 and DTCC ACAT services to facilitate transfers in kind.
Accounting	Services now provided by EdgeCo. Includes corporate accounting, finance, treasury, regulatory reporting, and customer invoicing and collection.

Department	Responsibilities
Risk and Corporate Compliance	Some services now provided by EdgeCo while others remain internalized within MATC. This Department performs three primary functions: Internal Audit, Enterprise Risk Management, and Corporate Compliance. <i>Internal Audit</i> provides independent audit services to help the Group manage risk, monitor compliance with internal policies and procedures, and assess operating effectiveness of control activities. <i>Enterprise Risk Management</i> provides general risk oversight of EdgeCo affiliates. Manages Risk Committee. The <i>Corporate Compliance</i> Officer develops and enhances the Trust Company's regulatory compliance program to ensure the Trust Company is in compliance with applicable regulatory rules and regulations.

Human Resources Policies and Practices

Formal job descriptions communicate the general function and specific duties of a position. All applicants pass through an interview process that assesses their qualifications related to the expected responsibility level of the position. Upon employment, the new employee's background is reviewed for past employment history, credit, education, and criminal activity.

Employees are provided with measurable objectives that are evaluated on a monthly basis. Mid Atlantic strives to provide a work environment free from all forms of improper discrimination and harassment, including sexual harassment. This policy applies to aspects of employment, such as hiring, compensation, promotion and disciplinary action.

Mid Atlantic aims to provide a safe work environment. Employees are expected to adhere to legal, ethical, and other commonly accepted standards of business conduct. Mid Atlantic prohibits violence and threats of violence in the workplace or while otherwise represented Mid Atlantic. The physical or verbal abuse of others, including fellow employees, customers, vendor, is prohibited.

Risk Assessment Process

Mid Atlantic operates in an environment faced with a variety of risk from external and internal sources. Risk is defined as the possibility that an event will occur and adversely affect the achievement of objectives.

The process of identifying, assessing, and managing risk is a critical component of Mid Atlantic's internal control system. The purpose of Mid Atlantic's risk assessment process is to identify, assess, and manage risks that affect the organization's ability to achieve its objectives as it relates to securing customer data and making it available. Management also monitors internal controls to evaluate whether they are operating as intended, and whether they are modified, as appropriate, for changes in conditions or risks facing the Group, including those associated with technological, environmental and regulatory changes.

Controls, compliance and risk management are primarily the responsibility of individual departments, including performing periodic assessments that identify and document significant risks facing the Company. The results of these assessments are used to determine the department's operational and compliance processes for which comprehensive and detailed risk assessments should be performed. Internal Audit offers support of these risk assessments through common methodology, tools, and ongoing consulting.

Ongoing monitoring procedures are built into the normal recurring activities, and include regular management and supervisory activities.

Control Activities

Control activities are the actions established through policies and procedures that help ensure that management directives are carried out. Control activities are performed at each level and at various states within business processes. They may be preventive or detective in nature and may encompass a range of manual and automated activities, including authorizations and reconciliations. Segregation of duties is typically built into business processes when applicable. The following outlines Mid Atlantic's approach to define control activities.

a. Policies and Procedures

Mid Atlantic maintains operating policies and procedures for use by each department who performs various functions and administers client services. The policies and procedures are established and conducted in accordance with applicable regulation and under applicable general business practices. Operating and technology related control policies and procedures are maintained with company and industry standards. The policies and procedures are updated as needed, and relevant personnel are notified when a policy or procedure has been added or modified. Relevant policies and procedures are made available to employees through TNS's intranet (Employee Neighborhood), Employee Navigator, and through shared network drives.

b. Key Control Concepts

Mid Atlantic's development and implementation of controls includes the concept of identifying key controls for critical business processes. Key controls are explicitly designed to mitigate key risks and focus on ensuring that processes meet the intended purposes and stated objectives. Management places heightened focus on the identification and creations of key controls. Internal Audit is responsible for testing the key controls to ensure they are properly designed to mitigate risk and are operating effectively.

Information and Communication

Information is necessary for the Company to carry out internal control responsibilities that support the achievement of its objective. Information is identified, captured, processed, and reported by information systems. Employees receive the information they need on a timely basis to be able to perform their jobs. Relevant information includes applicable external sources, such as economic and regulatory information, as well as internally generated information.

Communication is defined, in a broad sense, by expectations and responsibilities of individuals and groups. Mid Atlantic expects employees to be truthful in communications, including those with customers, management and other company personnel. Misrepresentation, including omission of important facts is unacceptable.

Information emails, web-based information sessions (InfoxChange), TNS intranet component, and the Mid Atlantic website are mechanisms used to keep employees informed. Efforts have been made to help organize and disseminate required information to department leaders in order to help them to provide pertinent information to their employees. Furthermore, formal department leader meetings are held on a regular basis as a means to disseminate the flow of information.

Mid Atlantic utilizes the following primary software application to provide its Trust and Custody Services.

System	Description and Use	Underlying Technology Platform
Transaction Network Services ("TNS")	Platform used for on-boarding and processing customer transactions, account valuation, and reporting for user entities	Web-based

Monitoring Activities

Monitoring requires (1) a clear understanding of processes and their relationship to key risks; (2) progress towards addressing the high rated risks; and (3) ongoing risk exposure and effectiveness of management of the risks. Mid Atlantic employs the following methodology to ensure that monitoring occurs.

a. Ongoing Monitoring

Mid Atlantic has a formal, management information and reporting system that enables management to monitor key control and performance measurements on a daily basis. There are several key reporting processes that are completed on regular intervals (i.e., daily, weekly, and monthly basis), with results being reviewed regularly by management. Management personnel are experienced in the financial services industry and maintain required licenses.

b. Regulatory Oversight

Mid Atlantic Trust Company and Mid Atlantic Clearing and Settlement Corporation are subject to regulation, supervision, and periodic examination by various regulators including the South Dakota Division of Banking and the Financial Industry Regulatory Association ("FINRA"), respectively. Mid Atlantic is required to comply with statutory minimum net capital requirements and to file periodic reports with the respective regulator.

c. Customer Satisfaction Monitoring

Mid Atlantic surveys customers throughout the year to determine Customer satisfaction with Mid Atlantic products and ongoing service delivery. Management communicates regularly with internal staff and Customers to discuss issues and Customer satisfaction.

d. Subservice Organization Monitoring

As noted in Section II, Mid Atlantic uses Subservice Organizations. Due to the relevance and importance of the services provided by these subservice organizations, Mid Atlantic's control activities includes formal due diligence processes, both initial and annually, thereafter, and formal monitoring procedures.

EdgeCo Enterprise Information Technology ("EIT")

EdgeCo EIT has established a portfolio management structure to help coordinate service delivery to each product vertical. The MATC vertical ("MATC") has a dedicated Product Manager. A Portfolio Management Committee consisting of senior MATC managers meets at least twice monthly to review development backlogs, receive updates on production releases, and vote on enhancement requests. The EdgeCo Information Security committee also meets on a regular basis and members of MATC sit on the committee to receive direct updates and oversee work of the Chief Information Security Officer and team.

Through daily interaction with the various EIT workgroups, MATC has regular oversight of EIT. Additionally, EdgeCo EIT CIO reports to the EdgeCo Board. Executives of MATC participate in quarterly board meetings to receive updates on EIT activities.

Broadridge

Mid Atlantic Management and the EdgeCo Risk and Corporate Compliance department obtains and reviews the SOC report on an annual basis. In addition, through its daily operational activities, management monitors the services provided to ensure that operations and controls expected to be implemented at the subservice organization are operating as intended.

e. Vendor On-Boarding and Risk Management Program

Mid Atlantic maintains a risk-based, Third Party Vendor Due Diligence program for new and existing vendors. Initially, vendors are classified as "Critical" or "Non-Critical" and assigned a risk rating of either Low, Low-Moderate, Moderate, Moderate-High or High based on certain criteria as outlined below. Vendors are subject to an initial due diligence process. Then vendors classified as Critical or Non-Critical and higher risk are subject to ongoing due diligence procedures. Vendor classification and risk assessment is evaluated annually.

Vendor Classification

The department, utilizing the vendor product/services categorizes each vendor as either Critical or Non-Critical using standard criteria. If a vendor is deemed a "critical" vendor, additional oversight requirements may apply based on the Third Party Vendor Due Diligence program. The vendor classification is reviewed and affirmed or modified by the internal business owner of the vendor relationship. The business owner should have the requisite knowledge and experience to best determine the critical nature of the vendor, ease of replacement, and dependence of MATC functions on products or services provided by that vendor.

Sub-Custodian Relationships

Management obtains and reviews independent ratings and analyses from Bauer Financial on each financial institution on a regular basis, at least quarterly, to monitor the bank's financial strength and security. Management also monitors the services provided to ensure that operations and controls expected to be implemented at the subservice organization are operating as intended.

Mid Atlantic Management and the EdgeCo Risk and Corporate Compliance department of Mid Atlantic obtain and review the SOC reports on an annual basis. In addition, through its daily operational activities, management monitors the services provided to ensure that operations and controls expected to be implemented at the subservice organization are operating as intended.

Risk Assessment

The department, or designee, also completes a standardized assessment within the Third Party Risk Management tool to determine the Vendor's inherent risk.

Typically, vendors are required to sign contractual agreements or non-disclosure documents which outline the vendor's security, availability, and confidentiality commitments and responsibilities.

The MATC Compliance Officer prepares a report summarizing the results of the annual due diligence process and provides the report to the Trust Company Board of Directors for evaluation and action, if needed.

Description of Institutional Trust and Custody Services

The following narratives provide an overview of the procedures and control activities in place to support the control objectives listed in Section IV of this Report.

Area	Control Objective
1. Account Administration	Controls provide reasonable assurance that account setup and maintenance is authorized and performed in accordance with the terms and conditions of the governing account instruments in a complete, accurate, and timely manner.
2. Trade Execution and Authorization	Controls provide reasonable assurance that investment transactions are properly authorized, settled and recorded in a complete, accurate, and timely manner.

Area	Control Objective
3. Pricing	Controls provide reasonable assurance that prices are obtained from authorized, independent sources and are recorded in a complete, accurate, and timely manner.
4. Asset Custody, Safekeeping and Reconciliation	Controls provide reasonable assurance that security movements and positions are reconciled accurately, completely, and in a timely manner to balances with custodians and physical certificates are safeguarded.
5. Income Collections	Controls provide reasonable assurance that investment income is recorded completely, accurately, and timely.
6. Asset Establishment	Controls provide reasonable assurance that new securities and changes to existing securities are authorized, set up, and maintained in a complete, accurate, and timely manner.
7. Corporate Actions	Controls provide reasonable assurance that corporate actions are received from an authorized source and notices are processed completely, accurately, and timely.
8. Cash Settlement	Controls provide reasonable assurance that cash balances of internal accounts related to external main depository activity are reconciled completely, accurately, and timely.
9. Client Statements	Controls provide reasonable assurance that creation of and modifications to client statements are systematically generated and made available to clients completely, accurately, and in a timely manner.
10. Client Transactions	Controls provide reasonable assurance that cash transactions and benefit distributions are authorized and processed accurately, timely and completely.
11. Unitized Funds	Controls provide reasonable assurance that net asset values for assets held in unitized funds specifically created for a trust client ("Unitized Funds") are calculated and reviewed in a complete, accurate, and timely manner using prices obtained from authorized independent sources.
12. Customer Fee Billing and Accounting	Controls provide reasonable assurance that trust fees are approved, calculated and recorded in a complete, accurate, and timely manner.

BUSINESS OPERATIONS

Account Administration

New Account Setup

New Client Relationships

Mid Atlantic provides trust and custody services to its Customers (banks, trust companies, recordkeepers, third party administrators, and advisors) and does not typically interact with the underlying Clients (beneficial account owners). Therefore, establishing an account on TNS is a two-step process. First, Mid Atlantic establishes a business relationship with the Customer. Then Mid Atlantic establishes the individual accounts associated with the Customer on TNS.

Mid Atlantic and the Customer enter into an agreement which outlines the responsibilities of each party and contains the fee schedules for the services to be performed.

For Institutional Account services, the agreement Mid Atlantic and the Customer (typically, the TPA or Record-keeper) enter into is the "Mid Atlantic Transaction Network System (TNS) Access Agreement". Depending on the services elected (e.g., custody, directed trustee, paying agent, reporting only, etc.), Mid Atlantic enters into the applicable account level agreements with the registered account owner. The agreements authorize Mid Atlantic to act upon instruction from the Customer, as authorized agent for the registered account owner.

Account Set Up

Once approved, a Customer is assigned a unique, four-character system access code ("Group number") to identify their firm. Accounts established on TNS are assigned a unique account number ("BIN #"). BINs associated with a Customer are linked to the Customer's Group number, allowing the Customer to have access only to their client account information. This feature restricts access to individual accounts to only authorized users at the Group level. Access granted at the account level is limited to that specific account only.

Customers facilitate the opening of institutional accounts on TNS by establishing the new accounts directly on TNS or by sending a copy of the account application, signed by the trustee or registered account holder to Mid Atlantic. Designated Trust Services associates establish the account(s) on TNS with new account information received directly from the Customer. The documentation required varies depending on the contracted services.

Once a BIN# is created in TNS, the BIN is captured in TNS's automated workflow management program, Taskmaster. TNS halts the account setup process and prevents the commencement of cash disbursement and trade processing until the required documentation is received and required steps completed. The "account type" and "social code" coding on the BIN's Profile Page in TNS enables Taskmaster to identify the required steps.

Account documents are scanned and stored electronically. The "TNS > Documents > Compliance" page contains fields for each of the required documents. Trust Services monitors Taskmaster throughout each business day. Trust Services records notes in Taskmaster so management can monitor the progress and identify potential obstacles or issues.

TNS tracks the date, time, and user identification code of the associate who established the new account information and who subsequently makes modifications to the basic account information.

Account Modifications and Changes

For Institutional Retirement Plan Accounts, Mid Atlantic does not receive retirement plan participant level information. Account modifications are limited to changes in a retirement plan's information such as address or contact person.

Mid Atlantic performs sub-custody services to other qualified custodian or financial institutions. The documentation requirements are not as stringent as direct custody services since the qualified custodian is responsible for compliance with applicable regulations.

Institutional Customers have the ability to change the account information directly in TNS or they can forward the modification request(s) to Trust Services to process. Customers are systematically prevented from changing the name of the account. Customers are required to submit documentation with the request before Trust Services proceeds with the modification. TNS also flags accounts in Taskmaster where Customers modified other information including the tax identification number, registration, dividend option, broker-of-record, etc. prompting Trust Services to follow-up and obtain additional information and documentation as necessary.

Authorized TNS Users

Only authorized TNS users can set up and maintain account information within TNS. Through authorization of the Customer, a designated associate of the Company establishes access to TNS for the authorized Customer representative(s). TNS has predefined user roles to restrict a user to only authorized activities. The Customer provides instructions to Mid Atlantic to establish authorized representatives with access to TNS along with the level of access to grant each representative. An authorized associate of the Customer can request to have administrative rights assigned to their user ID, which enables the associate to establish additional users to TNS and assign specific user rights to each additional user at the same or lower level as their user rights. Customers are responsible for monitoring TNS users with access to their accounts. TNS time stamps and tracks the identification of the system user that creates or modifies account information.

TNS provides Customers with access to transaction reports, account balance details, disbursement requests, and allows the Customer to retrieve daily, monthly and quarterly account statements. Read-only system access is also available to other user types such as plan sponsors, brokers, financial advisors, plan auditors, and model managers. TNS access is limited only to the accounts for which these user types are authorized through TNS user identifications and access level assignments.

TNS performs system edit checks during account setup and maintenance sessions. TNS prompts the authorized user, who is establishing a new account or editing an existing account, that certain required fields have not been completed or invalid data has been entered into a field.

Trade Execution and Authorization

Mid Atlantic supports trading of mutual funds and exchange traded funds by providing Customers with access to a proprietary routing system via TNS trading platform. Once an authorization agreement is obtained, a Mid Atlantic representative codes TNS to allow the Group to route trades for an account. The coding is built into TNS based on the account type: "custody", "paying agent", etc. The system automatically rejects a user's attempt to route trades through the system if the system has not been properly coded. Each system user is assigned an access role which consists of rights that control available TNS functions. Users with trading rights are permitted to remit trades to TNS on behalf of accounts for which they have authorization. Trading may be performed via direct interface between TNS and the client recordkeeping systems through Communication Server, upload of trade files to TNS, or via direct entry of orders in TNS using the Place Order utility. Mid Atlantic's Communication Server middleware is a proprietary web service program that allows external systems to interface with TNS.

TNS electronically receives trade files from its authorized Customers throughout the day and performs validations to ensure the trade instructions are in good order (e.g., the security is tradable by Mid Atlantic, the security is properly set up in the account, the account is properly set up and approved for trading, the account owns sufficient shares for sale transactions, etc.). Trade orders entered into or uploaded into TNS are logged in the Trade Order Blotter with the user ID and date/time stamp of the user entering or uploading the order instructions. If the orders are transmitted via an upload file, the file is maintained on the Mid Atlantic server, and the related process ID is linked to that file so that the audit trail of the originating instruction is preserved.

MATC routes mutual fund orders directly to the NSCC through MAC&SC's NSCC channels. ETF trades are transmitted to an equity execution venue with shares settling into an account at NFS. Change in status of each order, from the original transmission time through acknowledgement, confirmation, settlement, or rejection, is logged in TNS along with the process ID that updated the status. The process ID can be back-traced via an internal TNS identifier to the inbound or outbound file or job that changed the order's status.

Trades can be system rejected on the front end by TNS if the trade is transmitted by a user ID not authorized to transact on the account. Other reject reasons include invalid BIN #, invalid security identifier, account implementation not complete and not ready to trade, and other such validations.

If a mutual fund trade passes the initial validations, it is sent for transmission to the NSCC. ETF trades undergo the same validations before transmission to the designated execution agent. Transactions that cannot be validated are rejected systematically by TNS and returned to the Originator with the reason. Rejected trades received back are logged into TNS. TNS is configured to send electronic mail to internal Trust Trading operations representatives through a group designated email box. Additionally, TNS can be configured to send electronic mail to other interested parties such as the Customer's operations group. The Communication Server middleware also has options to send alerts to individuals indicating transmission failures or other front-end rejects. TNS tracks the status of Order File Uploads, and that trades are processed and settled in a complete, accurate, and timely manner.

Every morning to ensure all previous day's trade rejections and exceptions are addressed timely, Trust Trading exports the trade exception reports into electronic spreadsheets to document the reason for the exception and the corrective action plan. Trust Trading contacts fund companies to correct the trade information or attempt to price protect the transaction pending resubmission. The original trade is cancelled if no corrective action is available. Trust Trading notifies Customer contacts electronically of the trade status. The electronic spreadsheets are maintained on file.

Mutual fund trades are either rejected by the fund companies or confirmed for settlement. The TNS system has built in timelines to verify how long a trade record has stayed in a particular status. When a trade order is in a status past the preset parameters, it's identified systematically as a stale order for review. Trust Trading receives systematic emails and alerts when potential stale orders are identified and appropriate action is taken for resolution. Management monitors the issues database to ensure issues are claimed within 24 hours and resolved in a timely manner as dictated by the nature of the issue.

Trade records are available for view within TNS to those users with access to the trade blotter and underlying details. Trust Trading works with the execution venues to address trade rejects. Trust Trading has access to update the trade status to match the final execution or disposition based on instructions received from the fund company or transfer agent. Manual updates to trade status are fully logged within TNS with the user ID and date/time of the update.

Mid Atlantic routes trades received during normal business hours for execution with a trade date of that day. Trades files received after close of business which generated from trading instructions received by Customers from their underlying clients, e.g., plan sponsors, participants, and/or other authorized persons prior to the close of trading are executed with a trade date of as that day. For mutual funds, Mid Atlantic codes each order to be transmitted via TNS through the NSCC to the participating fund as of that day. Late day ETF trades are executed at the next day's market open but are settled with clients at the previous day's closing market price.

Pricing

Mid Atlantic contracts with third party vendors to obtain security price information. Once a vendor is approved, Software Development creates a TNS process to obtain, upload and process electronic files from the vendor. Mid Atlantic receives and processes price files from vendors on a daily basis.

MATC receives the NSCC Profile 1 file electronically to update TNS daily with prices and rates of NSCC-traded securities including mutual funds, money markets, stable value funds, and collective investment trusts ("CITs"). NSCC provides this same price file to all of its clients (brokers and custodians) who subscribe to the service. Mid Atlantic also receives electronic price files (consolidated closing price) daily from third party vendors (e.g., NFS, Bloomberg, etc.) for ETFs and other equity securities.

As a TNS stored price verification, TNS runs a process daily to compare trade confirmation files against TNS stored prices and flags price variances on a Settlement Warnings report. Trust Trading reviews the report weekly, to verify or correct any price exceptions using the fund company or Bloomberg as the secondary or backup pricing vendor. The reviewer formally documents the review and summarizes the corrective action taken, if any, on the report.

Positions are required to have an updated price in order for account statements to publish. In the event that a position's price has not updated, since the published statement, TNS creates an error message and identify the

security with the stale price. Reconciliation is responsible for monitoring the statement publishing process and for resolving missing price exceptions.

Asset Custody, Safekeeping and Reconciliation

Security Positions

Mid Atlantic primarily uses sub-custodians for the safekeeping of Customer securities. Mid Atlantic uses NFS as custodian for Customer ETF and non-mutual fund securities. Customers send ETF trade files to Mid Atlantic. Mid Atlantic routes the trades (through NewEdge Securities) to various equity execution venues through its trading platform for settlement in an omnibus account at NFS. The security positions are held in an omnibus account at NFS in MATC's name for the benefit of clients. Mid Atlantic has access to NFS's secured, web-based system to obtain real time account information in addition to historical account statements. Mid Atlantic also receives daily electronic data files of transactions affecting the omnibus account which are used to update TNS. Reconciliation performs daily omnibus account reconciliations to ensure the positions per TNS agree to the positions held at the custodian.

Mutual fund holdings are held in safekeeping directly at the mutual fund companies. Customers route mutual fund trade orders to Mid Atlantic. The mutual fund transactions are executed and settled directly through the NSCC under MAC&SC's membership. As a result, MAC&SC receive the daily electronic settlement and income files from the NSCC which are used to update TNS. An exception to the NSCC trade process exists for 403(b) retirement plan clients using unitized models. Mid Atlantic offers two Federated money market funds as a cash alternative. Based on the net daily activity in the unitized funds, TNS generates trade instructions and posts the instructions as an Issue on the TNS homepage. Trust Trading claims the Issue and manually enters the trade instructions on the Federated proprietary platform. Trust Trading is also responsible for manually posting security income to TNS.

TNS reconciles security positions throughout the day against unaffiliated custodian and depository records and produces out-of-balance exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused the exception. Reconciling items in omnibus trading accounts must be properly addressed within one (1) business day. All other reconciling items are prioritized and addressed accordingly. The time frames for clearing reconciling items in fully disclosed accounts exist and vary based on the account type and the nature of the reconciling item. If the responsibility to process a correction resides with the custodian, Reconciliation is responsible for the timely communication with the custodian and monitoring until resolved.

Cash Balances

Mid Atlantic uses well capitalized, FDIC insured banks and other financial institutions for the custody of cash. Cash is held in restricted bank accounts in MATC's name for the benefit of its Customers.

A Reconciliation Team member reconciles the cash balances and activity in customer bank accounts on a daily basis, and researches and resolves discrepancies. The Reconciliation manager reviews the reconciliation and the research and resolution of discrepancies on a monthly basis. The month end reconciliation is captured in TNS and stored electronically by the Reconciliation manager as evidence of review.

Physical Stock Certificates

Mid Atlantic maintains a safe deposit box in a separate financial institution for purposes of holding physical stock certificates, when needed. Only authorized personnel may access the box, and access requires two individuals to be present to access the contents. A log is maintained of activity surrounding the safe deposit box. Review of the log for the physical certificates requires two authorized individuals to review and sign off. Designated Trust Services associates perform a reconciliation of the securities held in the safety deposit box to the information reflected on TNS semi-annually. Two trust officers are required be present during the physical security reconciliation process. Both officers evidence the reconciliation process by signing the physical security log maintained in the vault.

Income Collections

As securities are held by third-party custodians in several locations, these custodians pass cash dividends, stock dividends and other income payments to Mid Atlantic. NSCC and NFS are the most common sources of income payments. The custodians provide dividend information electronically with dividend codes which are uploaded into TNS. TNS uses this information to create the income event that identifies the accounts due a dividend and the amount based on the rates and record date positions.

TNS receives dividend rate information electronically through NSCC Profile II files and third-party vendors, and automatically posts the dividends for fully disclosed accounts. For omnibus trading accounts, TNS performs the sub-accounting. Reconciliation manually initiates the TNS process to allocate and post the dividends to the respective sub-accounts. Reconciliation receives notification through various TNS reconciliation reports when a discrepancy exists between the omnibus account and the related sub accounts. These reconciling items are properly and timely resolved within one (1) business day. The Reconciliation manager store the files electronically evidencing the review on a weekly basis. Fully disclosed cash dividends are processed systemically. Straight cash dividends for ETF omnibus clients are allocated through TNS manually to ensure those who prefer to reinvest their dividends can have an entry added to purchase the proper amount of shares (dollar specific trade).

Daily, Asset Movement and Control reconciles the total of the cash dividends included in the custodian files to the total cash dividends posted in TNS. Cash items included in the NSCC files which cannot be posted to an individual account on TNS are posted to a suspense account. Asset Movement and Control ("AMC") monitors the suspense accounts throughout the day and must resolve exceptions within three business (3) days for items over \$10 and up to one week for items under \$10. Mid Atlantic returns unidentified items to the sending party within pre-defined time periods based on the dollar amount of the transaction. Asset Movement and Control prepares a packet of the various reconciliations performed, correspondence received and other critical documentation. The reconciliation report is reviewed by the AMC manager who evidences the review by initialing the daily packet cover sheet. The daily packet is scanned and electronically filed.

For instances where dividend information is not received accurately or completely, TNS creates a cash or position break during the automated process to reconcile TNS to the custodian. Refer to Objective 4: Asset Custody, Safekeeping and Reconciliation.

Asset Establishment

For Mid Atlantic to establish new accounts and perform daily processing, securities must be accurately established in TNS. On a daily basis, TNS receives descriptive data to establish and modify securities in its security master database from the following daily vendor files.

- DTCC/NSCC feeds security information for DTCC/NSCC eligible mutual and collective fund securities; and
- Morningstar, Inc. feeds security information for exchange traded products.

These third-party vendor data files are the primary source for the establishment of new securities in the security master database. However, Customers' requests include securities not current in the security master database. Fund Services adds the security after proper approval is obtained from Product Management. Fund Services is responsible for establishing and maintaining securities in the TNS security master database. When first established, the trading indicator for new securities is coded "not tradable". During the new account setup process, Taskmaster halts the process when a user is attempting to add a security coded as "not tradable" to the account's investment lineup. Fund Services monitors Taskmaster throughout the day and claims these related tasks.

For mutual fund requests, Fund Services compares the request to standardized requirements including NSCC eligibility and fund contractual and prospectus obligation compliance requirements. If approved, Mid Atlantic enters into a selling agreement with the Fund Company. Once the required documents are executed Fund Services updates the trading indicator to "tradable".

For exchange traded product requests, Fund Services notifies the Mid Atlantic Trading Desk who is responsible for evaluating the security against internal product guidelines and requirements. The Mid Atlantic Trading Desk

or Product Management team may update the security trading indicator or notify Fund Services of the approval to process the update.

Mid Atlantic facilitates the trading of NSCC eligible mutual funds only. The security master database includes NSCC ineligible securities established through Morningstar data feeds. The security attributes included in the data feeds includes a hard coded NSCC eligibility flag. As with all other securities, the trading flag is initially marked "not tradable". TNS flags NSCC ineligible security with a trading indicator of "tradable" on an exception report. Fund Services monitors the exception report at least weekly and corrects reported securities. Fund Services Management monitors the report at least weekly to ensure discrepancies are resolved.

Mid Atlantic provides consolidated retirement plan reporting, and at the election of the retirement plan, report securities or other assets on the account statements as "sundry assets". Mid Atlantic does not hold or trade these securities. However, these securities are included in the security master database. Fund Services receives security set-up requests throughout the day via a centralized group e-mail box to manually establish these securities in the security master for reporting purposes.

New securities or changes to security attributes stored in the security master are received through the vendor feeds described above. A member of the Trust Trading initiates the automated process to map and convert securities involved in fund mergers and other corporate actions in order to update holdings in client accounts. Refer to Objective 4: Corporate Actions.

Additionally, for any instances where assets are not established accurately or completely, TNS creates a cash or position break during the automated process to reconcile TNS to the custodian. Refer to Objective 4: Asset Custody, Safekeeping and Reconciliation.

Corporate Actions

Mid Atlantic is notified of fund closures, mergers, security identifier changes, and other events via multiple sources. The NSCC sends Mid Atlantic electronic daily files containing updated NSCC eligible mutual fund information. Additionally, Mid Atlantic subscribes to a third-party vendor, Mergent, that provides a nightly file of fund changes. Upon receipt, automated TNS process loads the Mergent file and updates the respective research material and information in TNS. Only authorized internal and external TNS users have access to this information for research based on access rights.

Fund Services manually updates the TNS security master for changes that do not result in changes to the security's identifier (e.g., name changes, etc.). Changes to a security identifier that result in transfer of balance from one security identifier to another are processed within TNS by Trust Trading using the Fund Merger utility. Trust Trading obtains the merger/transfer ratio from the fund company and enters the information into TNS; then TNS posts transfer transactions to each affected account to show the balances moving from the old to the new security identifier.

Equity or ETF corporate action notifications are received from NFS. NFS typically processes required changes and provides notification to Mid Atlantic when further action is required. When corporate actions are processed, an electronic feed of the resulting activity is transmitted to the Company. Any additional processing of the corporate action is identified as an out of balance condition through the TNS daily reconciliation process. Reconciliation monitors exception reports daily to ensure that corporate actions are processed timely and accurately. Refer to Objective 4: Asset Custody, Safekeeping and Reconciliation.

Changes processed in TNS is evidenced through the audit log indicating the user identification and the date change was made. Reconciliation monitors exception reports daily to ensure that corporate actions that occurred without notice are identified timely and processed.

Cash Settlement

As a member of the NSCC, MAC&SC is required to maintain a bank account for settlement purposes with an NSCC approved financial institution. MAC&SC maintains its settlement bank account at Huntington National Bank. The bank account is a zero-balance account used for settlement purposes only. The NSCC has direct access to the account via the Fed to deposit proceeds from net redemptions and to deduct payment for net purchases.

NSCC

Mutual Fund transactions settle on a T+1 basis. Mid Atlantic settles mutual fund trades internally on a T+1 basis, this includes trades executed on Day 1 and up generally through 8:00 am on Day 2.

NSCC sends detail activity files electronically which are used to post the activity to TNS. The NSCC processes a bundled payment for the net amount.

Trades (buys and sells): NSCC sends multiple settlement files between 10:30 am to 12:15 pm. TNS runs an automated process to post the transactions to the associated accounts. TNS generates "expected net settlement" reports based on these files. The cash activity associated with these transactions is included in the NSCC daily settlement.

Dividends: The NSCC sends dividend pay-date files around 5:30 am which are systemically processed by TNS and posted to the associated accounts. The cash activity associated with the dividend records is included in the NSCC daily settlement totals.

Mutual Fund Payments (incoming) (commissions, 12b-1s, sub-TA, etc.): The NSCC sends the detail transaction files at 4 pm daily. The cash activity associated with the mutual fund payment records is included in the next business day's NSCC daily settlement.

Commission Payments (outbound –via Payment aXis): Mid Atlantic sends the NSCC the detail payment files on Day 1. The cash activity associated with the commission payment records is deducted from the next day's NSCC daily settlement.

Each morning, AMC receives an electronic settlement file from the NSCC and an electronic notification from the settlement bank of the expected cash settlement amount (debit or credit). AMC is responsible for performing a three-way reconciliation between the bank total, the NSCC file totals, and the trade-related cash activity posted on TNS (from the NSCC settlement files). AMC ensures totals reconcile before transferring funds to the settlement bank account for that day's settlement. The daily reconciliation reports are reviewed by the AMC manager who evidences the review by initialing the daily packet cover sheet or electronically verifying within the report PDF file. The daily packet is scanned and electronically filed.

Each morning, AMC manually reconciles the cash activity posted to TNS to the respective day's deposits and disbursement requests and to activity that cleared the segregated bank accounts. For any reconciling items, explanations are documented within the reconciliation. If a discrepancy is related to a deposit or disbursement entry error, the associate who entered the data is responsible for correcting the problem. The daily reconciliation reports are reviewed by the AMC manager who evidences the review electronically within report PDF file or by initialing the daily packet cover sheet, which is scanned and electronically filed.

All Other Securities

Mid Atlantic settles ETF trades internally on a T+1 basis, this includes trades executed on Day 1 and up through 9:15 am on Day 2. Unitized Fund trades and ETF trade files received over night are placed at the market open. The trades are settled with the street at the market open price and settled with the underlying client at the previous day's NAV. In the evening, TNS receives files from SS&C with the end of day prices for ETF securities. MATC confirms the transactions with the underlying clients using the stored end of day value. The last trades are confirmed by 9:35 am.

Each morning, Reconciliation is responsible for performing a reconciliation between the Mid Atlantic's ETF Omnibus Trading Account and the omnibus account held by a third-party custodian to ensure cash settlement transactions were processed completely and accurately. Management reviews the reconciliation daily and evidences the review electronically. Discrepancies are researched and resolved.

Client Statements

Statement Publishing

Serving in its capacity as Directed Trustee and Custodian, Mid Atlantic has the obligation to provide periodic and year-end account statements ("statements") to the registered account holder.

Clients provide the account level contact information and elect a statement delivery method, of either electronic or physical mail, on the account level custody agreements and/or other applicable documents. The authorized TNS user establishing the account, enters the statement instructions in TNS. Refer to Objective 1: Account Administration for additional information on the account establishment processes.

TNS, through automated processes, produces the statements which include, a description of securities and investments purchased and sold with the cost or net proceeds of such purchases or sales, a listing of cash, securities and other property held, itemized securities transactions, itemized cash receipts and disbursements, and a valuation of the Custody account.

TNS captures cash activity, confirmation, position, dividend, and settlement data from third party custodians through real-time interfaces and/or duplicate file receipt. The automated TNS statement publishing process starts on the evening after the third business day of each month. During this process, TNS runs reconciliation processes throughout the day and produces out-of-balance exception reports, which are utilized by Reconciliation to research, record or adjust the activity that caused an exception to be raised. Reconciliation is responsible for publishing statements for all active custody accounts monthly by the end of the subsequent month per internal standards. TNS does not publish an account statement if an out-of-balance condition exists. Once an account is reconciled, TNS publishes the statement and make the statement available for viewing online. TNS electronically archives previously published account statements.

Out-of-Balance conditions include custodian share and cash variances, missing price, stale dated price, etc. If the fair value of other assets has been reported in the prior month and current market values have not been obtained, TNS flags the account as having a stale dated price (as the market value of these assets has not changed from the prior month) and will not generate a statement until Reconciliation addresses the matter.

Additionally, for any out-of-balances, TNS creates a cash or position break during the automated process to reconcile TNS to the custodian. Refer to Objective 4: Asset Custody, Safekeeping and Reconciliation.

Reporting Other Plan Assets Not Held by Mid Atlantic

Some retirement plans offer a self-directed brokerage account option to its participants. The assets in these self-directed brokerage accounts are typically held at third-party custodians. Some Customers prefer to have these assets reported on the consolidated plan level statements generated by Mid Atlantic. Therefore, Mid Atlantic establishes electronic file connectivity with the third-party custodian in order to receive updated account balance information for statement generation purposes. If electronic file connectivity cannot be established, then the Customer is responsible for providing Mid Atlantic with current market values of the total account as of the statement publishing date.

Likewise, some plan participants may have outstanding loans against their plan assets or hold annuity or other insurance products that are not held by Mid Atlantic. If the Customer elects to include these assets on the consolidated plan level statements generated by Mid Atlantic, the Customer is responsible for providing Mid Atlantic with the current market value.

Statement Delivery

Once statements are automatically generated, TNS delivers the statements based on the Client's delivery option.

- TNS Web Portal: TNS automatically publishes all statements, which are available to clients via the TNS web portal. The Client contacts log into TNS to obtain the statement.

- **Email Link:** TNS sends the registered account holder and/or designated client contact a statement availability alert containing a hyperlink to the statement. The link is an expiring link and the IP address of the contact as well as the date and time of each access using the link are captured for audit purposes.
- **Physical Mail:** A registered account holder and/or designated client contact elects to receive a paper statement through the US Postal Service. Even though the majority of Institutional Customers elect electronic delivery options, this option is available.

Physical Mail Process

Every day, a TNS automated process identifies statements that published during the day for accounts with contacts electing or requiring receipt of physical statements. The process creates an electronic file of the statements and pends the paper statements in a queue awaiting review and validation.

Under sub-custodian relationships where another qualified custodian outsources certain functions to MATC, the custodian is provided account level statements of the beneficial account holder. In these circumstances, TNS produces statements to confirm that the underlying accounts' activity and balances have been properly reconciled and electronically available to the custodian, not the beneficial account owner.

For Directed Trustee accounts requiring physical statements, once the published statement is available, on a quarterly basis the Operations team validates the pending statement is due in TNS to the contact for the account and will then print and mail the physical statement. This process is tracked by Operations via a control sheet.

Electronic Delivery and Failures

Once a statement is published, TNS generates an email to the account contact requesting electronic delivery. TNS sends the email from designated administrative email boxes. A TNS process checks these email boxes throughout the day to identify undeliverable emails, logs the bad email address, flags the contact's information in TNS as having a bad email address, and creates a report "Bad Email Contacts". Quarterly, Trust Services reviews the TNS report and notifies the Customer when a Client has a bad email. It is the responsibility of the Customer to contact the Client to obtain a valid email address. For accounts for which it serves as directed trustee, if Mid Atlantic cannot provide an account statement electronically due to an identified bad email address, Mid Atlantic prints and mails Directed Trustee account physical statements on a quarterly basis to the designated account contact until a valid mail address is obtained.

Client Transactions

Disbursement Authorization

As stipulated by the various Group level and Account level agreements ("Agreements") between MATC, its customers and the registered account holders/Client, the Customer has access to its Client accounts in TNS and is authorized to enter disbursement requests in TNS, through the cashiering module, directly on behalf of a client. These Agreements also permit Mid Atlantic to process the distribution requests as received from the Customer without requiring additional documentation. Customers directly enter Client disbursement requests in TNS. For limited situations, AMC may enter a distribution request in TNS for a Customer; however, AMC requires written authorization from the Customer. Cash transactions manually entered into TNS by AMC associates are held in an "unreleased pending status". Requests entered into TNS by Mid Atlantic associates are subject to at least one level of systematic review, depending on the dollar value, for authorization and accuracy prior to approving and releasing the transaction for processing. TNS electronically archives the user identification of the associate who entered the request and the second associate who verified the transaction. When entering a distribution request, the Customer enters required information, including but not limited to, Payee, address, tax identification number, type of distribution (e.g., loan or reportable distribution), gross amount, and, if applicable the dollar amount of the federal and state income tax withholding amount.

Customer disbursement requests are transmitted electronically through an interface between TNS and their recordkeeping systems or entered manually through the cashiering module. For manual entries, Mid Atlantic requires Customers to initiate review and release processes for amounts greater than \$25,000. Customer entered disbursements that meet the threshold systematically held in "pending status" until another authorized

user accesses TNS and reviews and releases the request. TNS tracks the user identification of the associate who entered the request and the associate who reviewed and authorized the release of the request. The review and release threshold is customizable for each Customer; however, the \$25,000 threshold is the maximum amount that may be processed without independent review and authorization. Customer initiated disbursement requests over certain dollar amounts may also be subject to confirmation procedures by Cashiering associates. Check disbursement requests for amount equal to or greater than \$150,000 require confirmation with the designated client contact. The designated associate must send an email to the designated customer contact(s) verifying the amount and disbursement information. AMC maintains a tracking spreadsheet to document the transaction reference number, amount, customer, date, and the individual verifying the validity of the transaction.

Individual Retirement Account Distributions

Distribution requests from Individual Retirement Accounts ("IRA") must be accompanied by properly executed IRA distribution paperwork signed by the appropriate party. AMC may request additional documentation in order to verify the appropriateness of the appropriate party's signature and authority to request the distribution. For sub-custodial arrangements, MATC may take instruction from the account custodian.

Disbursement Processing

ACH and Wire Requests

TNS automatically generates and sends outgoing wire and ACH files to the Bank throughout the day. The outgoing wire and ACH files are automatically received by the Bank.

Check Requests

Checks are printed with an authorized check signer's imprinted signature. An authorized Operations officer reviews all disbursements for any check amounts greater than \$100,000. The TNS system validations enforce the check on availability of funds. The user and reviewer(s) have no option to modify the check payment instructions at any point in the process once the reviews are complete.

Processing banks send electronic files to Mid Atlantic daily with cleared check information including images of the cleared checks. Automated TNS processes upload the check files which update the check transactional information in TNS to reflect the status of "cleared" and post the cleared check images to the respective BIN # for access by the Customer. An "un-cashed check" report is available to Customers through TNS.

Returned Checks

The receptionist receives incoming mail. The receptionist logs returned checks in a password protected spreadsheet maintained before routing the checks to AMC for processing.

AMC records the returned item on a separate control spreadsheet which is uploaded into TNS to update the check transaction status information and to update the TNS returned item report. The returned check is physically stored in a safe before destruction if not re-processed.

Customers have access to the TNS returned items report associated with their Group number and are responsible for monitoring the report on a regular basis. Customers respond to the notice through the TNS Issues Database providing instructions on how to address (e.g., void and reissue to corrected address, resend as originally instructed as address is correct, void and credit the account, etc.).

Disbursement checks become void if not cashed within a 90-day time period. After 180 days, a returned, uncashed check that is not otherwise addressed, follows the procedure set forth for the stale check processing.

In the case of a check that was not received by a client and the Customer requests the issuance of a new, replacement check, AMC places a stop payment on the original check. However, before the stop payment request is processed, AMC verifies the check remains outstanding. Stop requests are also held for 24 hours to reduce the risk of processing a check for payment on the day of the stop payment request. AMC may reenter a request in TNS based on the original instructions. The Customer submits new authorized instructions if the amount of the requested deviates from the original instructions.

Stale Check Processing

On a quarterly basis, AMC prepares a report of uncashed checks older than 180 days and submits the report to a third-party vendor contracted to assist with the location of the payee. If located, the payee receives a notice and has 60 days to provide updated payment instructions.

Additionally, for any transactions not processed accurately or completely, TNS creates a cash or position break during the automated process to reconcile TNS to the custodian. Refer to Objective 4: Asset Custody, Safekeeping and Reconciliation.

Unitized Funds

ModelxChange® is a Mid Atlantic proprietary web-based technology for trading and rebalancing ETF and mutual fund based portfolios. It enables cost efficient, streamlined and sophisticated model management.

The ModelxChange platform allows 401(k) plan professionals to incorporate investment models into a retirement plan through the establishment of unitized fund accounts ("UF account"). When a model is used by a retirement plan account, the model portfolio is assigned a unique identifier (normally, a security identifier beginning with "MAT"), and a corresponding account (commonly designated by the prefix "UF") is established in TNS. The UF account is a BIN that comprises the securities in the model portfolio. The BIN utilizing the portfolio is linked through cross-reference of the MAT security value and the UF account. Mid Atlantic also unitizes other non-model securities such as employer stock.

Each UF account is valued nightly and a net asset value ("NAV") is computed, then the related MAT security's price is updated. There are various validations in place to ensure activity through the prior day's trade date has been included and that the account is in balance before the NAV is produced, published, and made available to third parties. An internal procedure governing unitized account processing is maintained and followed to ensure that the daily net asset value computed on each unitized portfolio is correct. TNS publishes statements and calculates net asset values for unitized fund accounts each business day. TNS will not allow a unitized account to publish a statement for an account if an out-of-balance condition exists or the underlying security prices have not been received for the business day. An out of balance condition is defined as positions and/or cash out of balance within the unitized account and underlying positions. A detailed list of possible out of balance conditions and checks enforced by the system is found in the Daily Unitization Procedures document.

Once the daily statement is published, TNS automatically calculates a net asset value. The NAV of the portfolio is the market value plus accrued income, minus accrued fees and divided by the number of outstanding units. Daily trades are executed once a net asset value has been calculated. TNS NAV calculation job runs until all unitized portfolios have been published to ensure that 100% of the portfolios have a published NAV for each trade date. Trust Trading monitors multiple daily unpublished statement reports as well as unconfirmed unit trade reports to ensure all statements are published daily and all unit activity is settled.

The NAV pricing routine validations include checks on ETF and equities held within the portfolio that have gone ex-dividend, meaning the accrued value of the dividend are included in the NAV through the pay/reinvest date. On ex-date of the income, TNS multiplies the share balance by the dividend rate to determine the accrued cash value of the dividend and include this value in the NAV calculation. The result is shown in the Accrued Income column of the unitized portfolio statement.

An issue is created on the TNS homepage when a unitized fund price has increased or decreased more than 5% from the prior day. Trust Trading validates the price of underlying securities to ensure that no pricing errors occurred using the Bloomberg terminal. Should a pricing error occur, Trust Trading updates the price of the underlying securities, adds commentary to the issue and republishes the NAV for the impacted portfolio(s), and assigns each issue on the TNS home page for review. Note that given market volatility during this period due to the pandemic and other factors, there were several dates on which the market as a whole fluctuated more than 5% from the prior day. These fluctuations were monitored in the same manner as unitized fund increases or decreases more than 5% from the prior day.

TNS automatically sweeps any residual cash balances less than or equal to \$250 in the unitized fund back to the retirement plan account. Trust Trading continues to monitor the report and for any residual balances exceeding

the system threshold of \$250, and manually sweeps any residual shares back to the retirement plan that held the unitized fund.

Additionally, in order to value unitized funds, Mid Atlantic receives daily price files from a third-party vendor. Refer to Objective 3: Pricing.

Customer Fee Billing and Accounting

Client Accounts

Mid Atlantic invoices the Customer for its services; Mid Atlantic does not invoice the individual Client accounts. The TNS Access Agreement, attachments, other equivalent agreements between MATC and the Customer include the agreed upon fee schedules. The Relationship Manager establishes the fee schedule(s) in TNS on the Group level under the Group's profile. Individual accounts established under a Group are linked to the appropriate fee schedule. The Fee Schedule field on the account level profile processing page within TNS is a required field, and the system halts the account setup process until a fee schedule is identified. Upon notification of the establishment of a new group on TNS, a Relationship Manager compares the fee schedule established in TNS to the signed client agreement. The Relationship Manager maintains documentation of the review.

TNS runs an automated process at the beginning of each month to identify billable items and calculates the amounts due based on the established fee schedules for the prior month. TNS also creates an invoice PDF and a billable items report for each client. Finance and Accounting loads the invoice PDF, billable items spreadsheet, and the statement to TNS for the TPA customers, this is done using the automated filing system.

A Relationship Manager separate from the Relationship Manager creating or modifying the fee schedule documents their review and approval of the new or modified fee schedule. Additionally, on a monthly basis a Relationship Manager reviews fee schedule adjustments and confirms that the invoicing cycle has properly accounted for the new or modified fee schedule accurately and completely.

Unitized Funds

There are administrative costs associated with offering unitized investment funds including management fees and custodial platform fees. The fees are outlined in the Unitized Model Fund Application executed between Mid Atlantic and the retirement plan sponsored and established in TNS by Trust Services during the account establishment process.

IV. Control Objectives and Related Controls

Mid Atlantic's control objectives and related controls are included in Section IV, Subsection IV of this report, "Information Provided by the Independent Service Auditor (Except for Control Objectives and Controls in Subsection IV Provided by Mid Atlantic)," the control objectives and controls provided by Mid Atlantic, tests of operating effectiveness, and results of testing provided by the Independent Service Auditor to eliminate the redundancy that would result from listing them in this section and repeating them in Section IV, Subsection IV. Although the control objectives and related controls are included in Section IV, Subsection IV, they are, nevertheless, an integral part of Mid Atlantic's description of the system.

V. Complementary Subservice Organization Controls

Mid Atlantic's control objectives and related controls are included in Section IV of this report cover only a portion of overall internal control for each user entity of the Mid Atlantic. It is not feasible for the control objectives related to trust and custody services on the TNS platform for Institutional Accounts to be achieved solely by the Mid Atlantic. Therefore, each user entity's internal control over financial reporting must be evaluated in conjunction with the Mid Atlantic's controls and the related tests and results described in Section IV of this report, taking into account the related complementary subservice organization controls expected to be implemented at the subservice organization as described below.

Complementary Subservice Organization Controls	Related Mid Atlantic Control Objective
EdgeCo Enterprise Information Technology	
EdgeCo is responsible for maintaining logical security over MATC related applications and systems including logical access to programs, data, and computer resources is restricted to authorized and appropriate users.	CO1 – Account Administration CO2 – Trade Execution and Authorization CO3 – Pricing CO4 – Asset, Custody, Safekeeping and Reconciliation CO5 – Income Collections CO6 – Asset Establishment CO7 – Corporate Actions CO8 – Cash Settlement CO9 – Client Statements CO10 – Client Transactions CO11 – Unitized Funds CO12 – Customer Fee Billing and Accounting
EdgeCo is responsible maintaining physical security over MATC related applications and systems including physical access to computer and other resources is restricted to authorized and appropriate personnel.	
EdgeCo is responsible for computer operations over MATC related applications and systems including application and system processing are authorized and executed in a complete, accurate, and timely manner, and deviations, problems, and errors are identified, tracked, recorded, and resolved in a complete, accurate, and timely manner.	
EdgeCo is responsible for the change management process over MATC related applications and systems including changes to application programs and related data management systems are authorized, tested, documented, approved, and implemented to result in the complete, accurate, and timely processing and reporting of transactions and balances.	
Broadridge Investor Communication Solutions	
Broadridge is responsible for the proxy voting and distribution process over MATC related account holder information used for electronic voting of proxies and distribution of self-voting accounts in a complete, accurate, and timely manner.	CO7 – Corporate Actions

VI. Complimentary User Entity Control Considerations

Mid Atlantic's trust and custody services on the TNS platform for Institutional Accounts processes were designed with the assumption that certain controls would be implemented by user entities. The application of specific controls at the user entities is necessary to achieve certain control objectives included in this report. In order for user entities and their independent auditors to rely on the controls reported on herein, each user entity must evaluate their internal controls to determine if the following user entity control considerations are contemplated and that the related control activities are implemented, if necessary. The complimentary user entity controls presented below should not be regarded as a comprehensive list of all controls that should be employed by other entities.

Complementary User Entity Control Considerations		Related Control Objective
Account Administration		
1.	Customer account setup and maintenance requests are authorized, and instructions are provided completely and accurately.	CO1 – Account Administration
2.	For new account setup and maintenance processed by user entities directly in MATC's TNS system, controls should exist to ensure completeness, accuracy, and timeliness of processing.	CO1 – Account Administration
3.	Account modification/ changes requests are authorized and instructions are provided accurately and completely.	CO1 – Account Administration CO9 – Client Statements
Customer Communications and Statement Distribution		
4.	Timely review of reports, statements, or correspondence provided by MATC is performed by the user organization and written notice of discrepancies is provided timely to MATC.	CO1 – Account Administration CO2 – Trade Execution and Authorization CO3 – Pricing CO4 – Asset Custody, Safekeeping, and Reconciliation CO5 – Income Collections CO7 – Corporate Actions CO9 – Client Statements CO10 – Client Transactions CO11 – Unitized Funds
5.	Customers must provide accurate statement delivery instructions (e.g., email address, physical address, etc.).	CO9 – Client Statements
6.	Customers must provide prompt notification of changes to statement delivery instructions.	CO9 – Client Statements
7.	Customer maintains procedures to ensure Clients are properly setup to receive account statements.	CO9 – Client Statements
8.	Customers respond to Mid Atlantic communications accurately, completely and timely.	CO1 – Account Administration CO2 – Trade Execution and Authorization CO10 – Client Transactions
9.	Customers should review information sent by Mid Atlantic, whether through electronic channels or alerts, and provide Mid Atlantic with timely feedback on errors.	CO7 – Corporate Actions
Trade Execution and Authorization		
10.	Customers ensure investment transactions are authorized and permitted in accordance with the underlying account's investment policy or other governing document.	CO2 – Trade Execution and Authorization

Complementary User Entity Control Considerations		Related Control Objective
11.	Customers ensure trade details are entered accurately into the various front-end systems.	CO2 – Trade Execution and Authorization
12.	Customers send authorized, accurate, and complete trade corrections to Mid Atlantic for processing.	CO2 – Trade Execution and Authorization
13.	Customers ensure compliance with mutual fund prospectus requirements and Mid Atlantic's late-trade submission requirements.	CO2 – Trade Execution and Authorization
Cash Settlement		
14.	Timely cash and position reconciliation of TNS transactions and balances by Client to their independent records.	CO8 – Cash Settlement
Client Transactions		
15.	Customers only permit authorized individuals to submit cashiering requests.	CO10 – Client Transactions
16.	Customers submit authorized, accurate and complete instructions for Mid Atlantic to process.	CO10 – Client Transactions
17.	Customers are responsible for confirming the source of Client distribution requests to ensure only authorized requests are submitted to Mid Atlantic for processing.	CO10 - Client Transactions
18.	For customers granted TNS user rights to enter disbursement requests manually in TNS directly on behalf of a client, customers are responsible for implementing review and release controls for disbursement requests of \$25,000 or more.	CO10- Client Transactions
19.	Customers independently perform timely cash and position reconciliation of TNS transactions and balances to their independent records.	CO10 – Client Transactions
Customer Fee Billing and Accounting		
20.	Clients are responsible for reviewing fee income rate setup and subsequent updates for completeness and accuracy.	CO12 – Customer Fee Billing and Accounting
21.	Clients are responsible for ensuring that fee income overrides are authorized and processed completely and accurately.	CO12 – Customer Fee Billing and Accounting
22.	Clients are responsible for reviewing their monthly invoices and TNS reporting, and communicating questions or discrepancies to MATC.	CO12 – Customer Fee Billing and Accounting

VII. Control Objectives and Related Controls Provided by Mid Atlantic

Control objectives and related controls provided by Mid Atlantic are included in Section IV of this report, "Information Provided by Independent Service Auditor Except for Control Objectives and Control Activities." Although the control objectives and related controls are included in Section IV and may not be included in Section III, they are, nevertheless, an integral part of the description of controls of Mid Atlantic.

Section IV:
Information Provided by
Independent Service Auditor
(Except for Control
Objectives and Controls in
Subsection IV Provided by
Mid Atlantic)

Section IV:

Information Provided by Independent Service Auditor

(Except for Control Objectives and Controls in Subsection IV Provided by Mid Atlantic)

I. Introduction

This report on the description of the system is intended to provide user entities and their auditors with information for their evaluation of the effect of a service organization on a user entity's internal control relating to Mid Atlantic's controls over its trust and custody services on the TNS platform for Institutional Accounts during some or all of the period October 1, 2021 to September 30, 2022.

This section presents the following information provided by Mid Atlantic:

- The control objectives specified by the management of Mid Atlantic.
- The controls established and specified by Mid Atlantic to achieve the specified control objectives.

Also included in this section is the following information provided by Deloitte & Touche LLP:

- A description of the tests performed by Deloitte & Touche LLP to determine whether Mid Atlantic's controls were operating with sufficient effectiveness to achieve specified control objectives. Deloitte & Touche LLP determined the nature, timing, and extent of the testing performed.
- The results of Deloitte & Touche LLP's tests of controls.

Our examination was conducted in accordance with the American Institute of Certified Public Accountants' ("AICPA") Statement on Standards for Attestation Engagements No. 18 ("SSAE 18"). SSAE 18 is inclusive of the following: (1) AT-C 105, *Concepts Common to all Attestation Engagements*; (2) AT-C 205, *Examination Engagements*; and (3) AT-C 320, *Reporting on an Examination of Controls at a Service Organization Relevant to User Entities' Internal Control Over Financial Reporting*. Our testing of Mid Atlantic's controls was restricted to the control objectives and related control activities listed in this Section IV and was not extended to controls described in Section III but not included in Section IV, or to controls that may be in effect at user organizations or subservice organizations.

It is each user's responsibility to evaluate the information included in this report in relation to internal control in place at individual user entities and subservice organizations to obtain an understanding and to assess control risk at the user entities. The controls at user entities, subservice organizations, and Mid Atlantic's controls should be evaluated together. If effective user entity or subservice organizations controls are not in place, Mid Atlantic's controls may not compensate for such weaknesses.

II. Control Environment Elements

The control environment sets the tone of an organization, influencing the control consciousness of its people. It is the foundation for other components of internal control, providing discipline and structure. In addition to the tests of design, implementation, and operating effectiveness of controls identified by Mid Atlantic, our procedures included tests of the following relevant elements of Mid Atlantic's control environment:

- a. Communication and Enforcement of Integrity and Ethical Values
- b. Commitment to Competence
- c. Participation by Those Charged with Governance
- d. Management's Philosophy and Operating Style
- e. Organization Structure and Assignment of Authority and Responsibility

- f. Human Resource Policies and Practices
- g. Risk Assessment Process
- h. Control Activities
- i. Information and Communication
- j. Monitoring Activities

Such tests included inquiry of the appropriate management, supervisory, and staff personnel; observation of Mid Atlantic's activities and operations, inspection of Mid Atlantic's documents and records, and re-performance of the application of Mid Atlantic's controls. The results of these tests were considered in planning the nature, timing, and extent of our testing of the control activities described in this section.

III. Tests of Operating Effectiveness

Our tests of the controls were designed to cover a representative number of transactions throughout the period from October 1, 2021 to September 30, 2022. In determining the nature, timing and extent of tests we considered, (a) the nature and frequency of the controls being tested, (b) the types of available evidential matter, (c) the nature of the control objectives to be met, (d) the assessed level of control risk, (e) the expected effectiveness of the test, and (f) the results of our tests of the control environment.

Description of Testing Procedures Performed

Deloitte & Touche LLP performed a variety of tests relating to the controls listed in this section throughout the period from October 1, 2021 to September 30, 2022. Our tests of controls were performed on controls as they existed during the period of October 1, 2021 to September 30, 2022 and were applied to those controls relating to control objectives specified by MATC.

In addition to the tests listed below, ascertained through multiple inquiries with management and the control owner that each control activity listed below operated as described throughout the period. Tests performed are described below:

Test	Description
Corroborative Inquiry	Conducted detailed interviews with relevant personnel to obtain evidence that the control was in operation during the report period and is accompanied by other procedures noted below that are necessary to corroborate the information derived from the inquiry.
Observation	Observed the performance of the control during the report period to evidence application of the specific control activity.
Examination of documentation/Inspection	If the performance of the control is documented, inspected documents and reports indicating performance of the control.
Reperformance of monitoring activities or manual controls	Obtained documents used in the monitoring activity or manual control activity and independently reperformed the procedures. Compared any exception items identified with those identified by the responsible control owner.
Reperformance of programmed processing	Input test data, manually calculated expected results, and compared actual results of processing to expectations.

Reliability of Information Produced by the Service Organization

We performed procedures to evaluate whether the information provided by the service organization, which includes (a) information provided by the service organization to the service auditor in response to ad hoc requests from the service auditor (e.g., population lists); (b) information used in the execution of a control (e.g., exception reports or transaction reconciliations); and (c) information prepared for user entities (e.g., user

access lists), was sufficiently reliable for our purposes by obtaining evidence about the accuracy and completeness of such information and evaluating whether the information was sufficiently precise and detailed for our purposes. Information we utilized as evidence may have included, but was not limited to:

- Standard “out of the box” reports as configured within the system
- Parameter-driven reports generated by Mid Atlantic’s systems
- Custom-developed reports that are not standard to the application such as scripts, report writers, and queries
- Spreadsheets that include relevant information utilized for the performance or testing of a control
- Mid Atlantic prepared analyses, schedules, or other evidence manually prepared and utilized by Mid Atlantic

Our procedures to evaluate whether this information was sufficiently reliable included obtaining evidence regarding the accuracy and completeness included procedures to address (a) the accuracy and completeness of source data and (b) the creation and modification of applicable report logic and parameters. While these procedures were not specifically called out in the test procedures listed in this section, they were completed as a component of our testing to support the evaluation of whether or not the information is sufficiently precise and detailed for purposes of fully testing the controls identified by Mid Atlantic.

Reporting on Results of Testing

The concept of materiality is not applied when reporting the results of tests of controls for which deviations have been identified because Deloitte & Touche LLP does not have the ability to determine whether a deviation will be relevant to a particular user entity. Consequently, Deloitte & Touche LLP reports all deviations.

IV. Information Provided by Independent Service Auditor (Except for Control Objectives and Controls Provided by Mid Atlantic)

Control Title	Control Activity	Test Procedures	Results of Tests
1. Account Administration - Controls provide reasonable assurance that account setup and maintenance is authorized and performed in accordance with the terms and conditions of the governing account instruments in a complete, accurate, and timely manner.			
1.1	In order to establish a relationship with Mid Atlantic, a Customer and Mid Atlantic enter into various written agreements that establish the responsibilities of both parties and outlines the fee arrangement. Once signed agreements are executed, the Trust Relationship Manager creates the Group, assigns a Group Number, loads the signed documents to TNS and notifies Trust Services that the relationship has been established and the underlying accounts can be on-boarded.	Inspected the written account agreements for a selection of new Mid Atlantic Institutional accounts to ascertain that the agreements were signed by both the customer and Mid Atlantic and that the agreements established responsibility of both parties along with an outlined fee agreement. Inspected TNS profiles for a selection of new Mid Atlantic Institutional accounts to ascertain that the group was created and a group number was assigned, the signed agreements were loaded, and the notification that the account can be on-boarded was sent to the trust services team in a complete, accurate, and timely manner.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
1.2	Trust Services monitors Taskmaster throughout the day to ensure the account opening process continues to progress and that the account is opened accurately. When Taskmaster flags a potential issue, the automated setup process is halted and the account is flagged, the Trust Services representative researches the issue, takes corrective action until all tasks have been completed.	Observed that TNS is systematically configured to halt an account setup to ascertain that potential issues were identified by the Taskmaster system. For a selection of new account set-ups flagged by Taskmaster, inspected screenshots from TNS to ascertain that accounts were opened accurately in TNS (i.e., the account on TNS reflects the paperwork submitted), and that a Trust Services representative reviewed the task and researched and resolved, if required, the issue in a timely manner.	No exceptions noted.
1.3	Customers are systematically prevented from changing the name of the account once established on TNS. Customers must submit authorized documents or written authorization for the name change with the request to Trust Services to initiate a name change.	Observed and inspected TNS evidence to ascertain that TNS systematically prevents customers from modifying the name of the account once it has been established. Inspected the legal documents or written authorization for a selection of institutional customer name changes in TNS to ascertain that name change requests were authorized.	No exceptions noted.
1.4	If a Customer modifies certain account details such as Tax Identification Number, Broker of Record, etc., TNS flags the account in Taskmaster prompting Trust Services to contact the Customer for additional information or documentation.	Observed and inspected TNS evidence to ascertain TNS automatically flags an account when a customer modifies certain account details such as a tax identification number and a broker of record, etc. For a selection of customer modification taskmaster alerts, inspected TNS evidence to ascertain that action was taken by a member of the Trust Services Team and that the alert was closed out by receipt of additional documentation from the customer, if required.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
1.5	Only authorized TNS users can set up and maintain account information within TNS. TNS time stamps and tracks the identification of the system user that creates or modifies account information.	Inspected a system - generated listing of users with access to setup and maintain account information to ascertain that the access is restricted to authorized personnel based on inquiry with management and inspection of employee job title. Observed the TNS audit trail to ascertain that TNS time stamps and tracks the identification of the user that created or modified account information.	No exceptions noted.
1.6	TNS performs system edit checks during account setup and maintenance sessions. TNS prompts the authorized user, who is establishing a new account or editing an existing account, that certain required fields have not been completed or invalid data has been entered into a field.	Observed and inspected TNS evidence to ascertain that TNS has system edit checks configured to prompt authorized users when establishing a new account or editing an existing account of missing information including incomplete fields or invalid data.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
2. Trade Execution and Authorization - Controls provide reasonable assurance that investment transactions are properly authorized, settled and recorded in a complete, accurate, and timely manner.			
2.1	In order to be assigned TNS user trading privileges, Customers must complete and submit a signed authorization agreement. The signed agreement allows the Customer to route trades for accounts under their group number. The Relationship Manager is responsible for obtaining signed, completed, Group Level documents and storing them in electronic format on TNS. Once an authorization agreement is obtained, a Mid Atlantic representative codes TNS to allow the Group to route trades for an account. The coding is built into TNS based on the account type: "custody" or "paying agent". TNS automatically rejects a user's attempt to route trades through the system if the user has not been properly coded with trading rights.	For a selection of TNS users with trading privileges, inspected signed authorization agreements to ascertain that trading privileges were authorized and that the Relationship Manager obtained and stored the group level documents in TNS. Observed and inspected TNS evidence to ascertain that the TNS system is systematically coded based on account type, "custody" or "paying agent", and that TNS systematically rejects trades if account is not properly coded.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
2.2	TNS electronically receives trade files from its authorized Customers throughout the day and performs validations to confirm the trade instructions are in good order, e.g., the security is tradable by Mid Atlantic, the security is properly set up in the account, the account is properly set up and approved for trading, the account owns sufficient shares for sale transactions. Transactions that cannot be validated are rejected systematically by TNS and returned to the Originator with the reason. TNS tracks the status of Order File Uploads, and that trades are processed and settled in a complete, accurate, and timely manner.	Performed multiple observations to ascertain TNS systematically performs validation checks on electronically received trade files from customers to confirm that trade instructions are in good order. Performed multiple observations to ascertain that transactions that cannot be validated are rejected systematically by TNS and returned to the Originator with the reason. Performed multiple observations to ascertain that TNS systematically tracks the status of Order File Uploads and that trades are processed and settled in a complete, accurate, and timely manner.	No exceptions noted.
2.3	Every morning to ensure all previous day's trade rejections and exceptions are addressed timely, Trust Trading exports the trade exception reports into electronic spreadsheets to document the reason for the exception and the corrective action plan. Trust Trading contacts fund companies to correct the trade information or attempt to price protect the transaction pending resubmission. The original trade is cancelled if no corrective action is available. Trust Trading notifies Customer contacts electronically of the trade status. The electronic spreadsheets are maintained on file.	For a selection of days, inspected the daily trade rejection and exception report spreadsheet to ascertain that Trust Trading monitored trade exceptions by documenting the reason for the exceptions and the corrective action plan. For a selection of TNS rejected trades, inspected TNS to ascertain that Trust Trading claimed the issue and resolved it in a timely manner or that the original trade was canceled if no corrective action was available. For a selection of TNS rejected trades, inspected TNS to ascertain that Trust Trading notified Customer contacts of the trade status and contacted fund companies to correct trade information or attempt to price protect the transaction pending resubmission, if necessary.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
2.4	When a trade is in a status longer than expected, TNS generates stale order exception report and creates an Issue alerting Trust Trading that a potential issue exists. Management monitors the issues database to ensure issues are claimed within 24 hours and resolved in a timely manner as dictated by the nature of the issue.	For a selection of TNS stale order exception issues, inspected TNS to ascertain that Trust Trading claimed the issue within 24 hours and resolved it in a timely manner.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
3. Pricing - Controls provide reasonable assurance that prices are obtained from authorized, independent sources and are recorded in a complete, accurate, and timely manner.			
3.1	MATC receives the NSCC Profile 1 file electronically to update TNS daily with mutual fund prices and rates. Mid Atlantic also receives electronic price files (consolidated closing price) daily from a third-party vendor for ETFs and other equity securities. If a price for any security is not received, the statement for the account holding that security will not publish. During the statement publishing process, TNS flags the account and the account appears on exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused an exception.	Observed and inspected TNS evidence to ascertain that mutual fund prices and rates are updated in TNS based on NSCC Profile 1 file received electronically. Observed and inspected TNS evidence to ascertain that closing price for ETFs and other equity securities are updated in TNS based on the daily electronic price files received from third party vendor. Observed and inspected TNS evidence to ascertain that TNS systematically does not publish an account statement if a price for any security associated with that account is not received. Observed and inspected TNS evidence to ascertain that the Reconciliation team researched and resolved exceptions based on the statement publishing exception reports.	No exceptions noted.
3.2	To confirm accuracy of the prices received from its pricing vendors or for those prices manually entered, Trust Trading reviews a TNS generated report that compares the prices stored in TNS to the price received on trade executions from counterparties. The report is reviewed weekly and any price exceptions are verified/updated using the fund company or Bloomberg as the secondary or backup pricing vendor, if necessary. The reviewer formally documents the review and summarizes corrective actions, if any.	For a selection of weeks, inspected Trust Trading's review of the TNS price exception report to ascertain that any price exceptions were verified or updated with the secondary or backup pricing vendor, if necessary. For a selection of weeks, inspected Trust Trading's review of the TNS price exception report to ascertain that the reviewer documented their signoff and summarized corrective actions, if any.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
4. Asset Custody, Safekeeping, and Reconciliation - Controls provide reasonable assurance that security movements and positions are reconciled accurately, completely, and in a timely manner to balances with custodians and physical certificates are safeguarded.			
4.1	TNS reconciles security positions throughout the day against unaffiliated custodian and depository records and produces out-of-balance exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused an exception. Reconciling items in omnibus trading accounts must be properly addressed within one (1) business day. All other reconciling items are prioritized and addressed within one week. The Reconciliation Department Manager conducts a weekly review of all out-of-balance exceptions in omnibus trading accounts to ensure exceptions have been resolved on a timely basis. For situations where reconciling items reside with the custodian, Reconciliation is responsible for the timely contact of the custodian and monitoring until resolved.	Performed an observation to ascertain that TNS systematically reconciled security positions throughout the day against unaffiliated custodian and depository records and that out-of-balance exception reports were produced. For a selection of weeks, inspected the out-of-balance exception reports to ascertain that the Reconciliation Department Manager performed a review of all out-of-balance exceptions in omnibus trading accounts to confirm exceptions were resolved on a timely basis. For a selection of reconciling items, inspected that the exceptions in omnibus trading accounts were properly addressed within one business day and all other reconciling items were addressed within one week. If the reconciling items resided with the custodian, inspected that Reconciliation made contact timely and monitored until resolved.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
4.2	A Reconciliation Team member reconciles the cash balances and activity in customer bank accounts on a daily basis, and researches and resolves discrepancies. The Reconciliation manager reviews the reconciliation and the research and resolution of discrepancies on a monthly basis. The month end reconciliation is captured in TNS and electronically stored by the Reconciliation manager as evidence of review.	For a selection of days, inspected the cash reconciliations to ascertain that the Reconciliation team reconciled the cash balances and activity in customer bank accounts on a daily basis, and that discrepancies were researched and resolved, as necessary. For a selection of months, inspected the month end reconciliation to ascertain that the Reconciliation Manager performed a month end review.	No exceptions noted.
4.3	The reconciliation between the securities held in the safe deposit box and the physical security records per TNS is performed two times per year. The reconciliation is performed by two trust officers and documented on a spreadsheet maintained in the safe deposit box. The two trust officers sign the reconciliation as evidence of their approval.	Inspected the full population of the safe deposit reconciliations to ascertain that a reconciliation of securities held in the safe deposit box and the physical security records per TNS was performed. Further, inspected the reconciliation document to ascertain that the reconciliation was performed and approved by two trust officers as evidenced by their signature.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
5. Income Collections - Controls provide reasonable assurance that investment income is recorded completely, accurately, and timely.			
5.1	Asset Movement and Control reconciles cash dividends received from the NSCC on a daily basis to the cash dividends posted to TNS. The reconciliation is documented and reviewed daily by a manager as evidenced by initials on the daily packet cover sheet or electronically verifying within the report PDF file which contains the reconciliation.	For a selection of days, inspected the daily cash dividend reconciliations to ascertain that Asset Movement and Control reconciled cash dividends received from the NSCC to the cash dividends posted to TNS. For a selection of days, inspected the daily cash dividend reconciliations to ascertain that the manager evidenced their review by initialing the daily packet cover sheet or electronically verifying within the report PDF.	No exceptions noted.
5.2	Cash items included in the NSCC files which cannot be posted to an individual account on TNS are posted to a suspense account. Asset Movement and Control monitors the suspense account for cash dividends on a daily basis. Exceptions, if any, must be addressed within three (3) business days for items over \$10 and within one week for items under \$10.	For a selection of days, inspected the cash items in NSCC files to ascertain that the cash items which cannot be posted to an individual account on TNS are posted to a suspense account. For a selection of days, inspected Asset Movement and Control's review of the suspense account to ascertain that cash dividend exceptions, if any, were addressed within three business days for items over \$10 and within one week for items under \$10.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
5.3	When a security is traded on an omnibus level, the paying agent remits investment income to the omnibus account. TNS performs the sub-accounting to allocate the investment income to the individual sub accounts. Reconciliation receives notification through various reconciliation reports when a discrepancy exists between the omnibus account and the related sub accounts. These reconciling items are properly and timely resolved within one (1) business day. Reconciliation stores documentation electronically to evidence the manager review on a weekly basis.	Performed an observation to ascertain that, when a security is traded on the omnibus level, the paying agent remitted investment income to the omnibus account and that TNS performed the sub-accounting allocation of investment income to sub accounts. For a selection of weeks, inspected the omnibus exception reports to ascertain that the Reconciliation Manager electronically evidenced their review. For the reconciling items on the weekly omnibus exception reports, inspected the exceptions were resolved timely within one (1) business day.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
6. Asset Establishment - Controls provide reasonable assurance that new securities and changes to existing securities are authorized, set up, and maintained in a complete, accurate, and timely manner.			
6.1	When first established, the trading indicator for new securities is systematically coded "not tradable". Taskmaster suspends the account setup process when a user attempts to add a security coded "not tradable". Fund Services claims the task and reviews the security to determine whether the security is NSCC eligible (mutual funds) and whether all required selling agreements and documentation is in place. Once approved, Fund Services updates the trading indicator in TNS to "tradable".	Observed and inspected TNS evidence to ascertain that when a new security is established TNS systematically codes the security as "not tradable". Observed and inspected TNS evidence to ascertain that Taskmaster systematically suspends the account setup process when a user attempts to add a security coded as "not tradable". For a selection of Taskmaster alerts, inspected TNS to ascertain that Fund Services reviewed the security to determine it was NSCC eligible and once approved that the trading status was updated to "tradable". For a selection of Taskmaster alerts, reperformed Fund Services review of required selling agreements and documentation to ascertain that the trading indicator for the new security was accurately updated to "tradable."	Exception Noted. For 1 out of 40 tasks, the security was inappropriately coded as "tradable" in TNS. [See Section V for management response]
6.2	An exception report exists in TNS which identifies a fund security marked "tradable" which is not coded as "NSCC eligible". Fund Services Management reviews the report at least weekly and researches and resolves the discrepancies.	Observed and inspected Fund Service's exception report to ascertain that the report identified a fund security marked "tradable" which was not coded as "NSCC eligible". For a selection of weeks, inspected Fund Services Management's review to ascertain that exceptions were researched and resolved.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
6.3	TNS reconciles security positions throughout the day against unaffiliated custodian and depository records and produces out-of-balance exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused an exception. Reconciling items in omnibus trading accounts must be properly addressed within one (1) business day. All other reconciling items are prioritized and addressed within one week. The Reconciliation Department Manager conducts a weekly review of all out-of-balance exceptions in omnibus trading accounts to ensure exceptions have been resolved on a timely basis. For situations where reconciling items reside with the custodian, Reconciliation is responsible for the timely contact of the custodian and monitoring until resolved.	Performed an observation to ascertain that TNS systematically reconciled security positions throughout the day against unaffiliated custodian and depository records and that out-of-balance exception reports were produced. For a selection of weeks, inspected the out-of-balance exception reports to ascertain that the Reconciliation Department Manager performed a review of all out-of-balance exceptions in omnibus trading accounts to confirm exceptions were resolved on a timely basis. For a selection of reconciling items, inspected that the exceptions in omnibus trading accounts were properly addressed within one business day and all other reconciling items were addressed within one week. If the reconciling items resided with the custodian, inspected that Reconciliation made contact timely and monitored until resolved.	No exceptions noted.
6.4	A Reconciliation Team member reconciles the cash balances and activity in customer bank accounts on a daily basis, and researches and resolves discrepancies. The Reconciliation manager reviews the reconciliation and the research and resolution of discrepancies on a monthly basis. The month end reconciliation is captured in TNS and electronically stored by the Reconciliation manager as evidence of review.	For a selection of days, inspected the cash reconciliations to ascertain that the Reconciliation team reconciled the cash balances and activity in customer bank accounts on a daily basis, and that discrepancies were researched and resolved, as necessary. For a selection of months, inspected the month end reconciliation to ascertain that the Reconciliation Manager performed a month end review.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
7. Corporate Actions - Controls provide reasonable assurance that corporate actions are received from an authorized source and notices are processed completely, accurately, and timely.			
7.1	For mutual funds, the Company receives notices of fund mergers from various third parties. TNS is systematically updated through a fund merger utility. Reconciliation monitors exception reports daily to confirm that any corporate actions that occur without notice are identified timely and processed.	Performed multiple observations to ascertain that TNS is systematically updated through a fund merger utility upon notices of fund mergers from various third parties. For a selection of weeks, inspected the out-of-balance exception reports to ascertain that the Reconciliation Department Manager performed a review of all out-of-balance exceptions in omnibus trading accounts to confirm exceptions were resolved on a timely basis.	No exceptions noted.
7.2	Corporate actions are processed systematically in TNS based on an electronic feed of the resulting activity transmitted to the Company.	Performed multiple observations to ascertain that the electronic feed systematically processed corporate actions into TNS.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
7.3	TNS reconciles security positions throughout the day against unaffiliated custodian and depository records and produces out-of-balance exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused an exception. Reconciling items in omnibus trading accounts must be properly addressed within one (1) business day. All other reconciling items are prioritized and addressed within one week. The Reconciliation Department Manager conducts a weekly review of all out-of-balance exceptions in omnibus trading accounts to ensure exceptions have been resolved on a timely basis. For situations where reconciling items reside with the custodian, Reconciliation is responsible for the timely contact of the custodian and monitoring until resolved.	Performed an observation to ascertain that TNS systematically reconciled security positions throughout the day against unaffiliated custodian and depository records and that out-of-balance exception reports were produced. For a selection of weeks, inspected the out-of-balance exception reports to ascertain that the Reconciliation Department Manager performed a review of all out-of-balance exceptions in omnibus trading accounts to confirm exceptions were resolved on a timely basis. For a selection of reconciling items, inspected that the exceptions in omnibus trading accounts were properly addressed within one business day and all other reconciling items were addressed within one week. If the reconciling items resided with the custodian, inspected that Reconciliation made contact timely and monitored until resolved.	No exceptions noted.
7.4	A Reconciliation Team member reconciles the cash balances and activity in customer bank accounts on a daily basis, and researches and resolves discrepancies. The Reconciliation manager reviews the reconciliation and the research and resolution of discrepancies on a monthly basis. The month end reconciliation is captured in TNS and electronically stored by the Reconciliation manager as evidence of review.	For a selection of days, inspected the cash reconciliations to ascertain that the Reconciliation team reconciled the cash balances and activity in customer bank accounts on a daily basis, and that discrepancies were researched and resolved, as necessary. For a selection of months, inspected the month end reconciliation to ascertain that the Reconciliation Manager performed a month end review.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
8. Cash Settlement - Controls provide reasonable assurance that cash balances of internal accounts related to external main depository activity are reconciled completely, accurately, and timely.			
8.1	Each morning, Asset Movement and Control ("AMC") receives an electronic settlement file from the NSCC and an electronic notification from the settlement bank of the expected cash settlement amount (debit or credit). An AMC Associate is responsible for performing a three-way reconciliation between the bank total, the NSCC file totals, and the trade-related cash activity posted on TNS (from the NSCC settlement file). The AMC Associate ensures all totals reconcile before transferring funds to the settlement bank account for that day's settlement. The daily reconciliation reports are reviewed by the AMC manager who evidences the review by initialing the daily packet cover sheet or electronically verifying within report PDF file.	For a selection of days, inspected the AMC's three-way reconciliation to ascertain that all totals reconcile before transferring funds to the settlement bank. For a selection of days, inspected the AMC's three-way reconciliation to ascertain the AMC manager reviewed the reconciliation as evidenced via initialing the daily packet cover sheet or electronically verifying within report PDF file.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
8.2	Each morning, an AMC associate manually reconciles the cash activity posted to TNS to the respective day's deposits and disbursement requests and to activity that cleared the segregated bank accounts. For any reconciling items, explanations are documented within the reconciliation. If a discrepancy is related to a deposit or disbursement entry error noted, the associate who entered the data is responsible for correcting the problem. The daily reconciliation reports are reviewed by the AMC manager who evidences the review by initialing the daily packet cover sheet or electronically verifying within report PDF file.	For a selection of days, inspected that an AMC associate reconciles cash activity posted to TNS to the respective day's deposits and disbursement requests and to activity that cleared the segregated bank accounts. For a selection of days, inspected AMC's daily reconciliation to ascertain that explanations for reconciling items are documented within the reconciliation, and if a discrepancy related to a deposit or disbursement entry is noted, the discrepancy was corrected by the AMC associate who entered the deposit or disbursement. For a selection of days, inspected AMC's daily reconciliation to ascertain that the AMC Manager evidences their review by initialing the daily packet cover sheet or electronically verifying within the report PDF file.	No exceptions noted.
8.3	Each morning, Reconciliation is responsible for performing a reconciliation between the Mid Atlantic's ETF Omnibus Trading Account and the omnibus account held by a third-party custodian to ensure cash settlement transactions were processed completely and accurately. Management reviews the reconciliation daily and electronically evidences the review monthly. Discrepancies, if any equal to or greater than \$100, are researched and resolved.	For a selection of days, inspected the daily reconciliations to ascertain that the Reconciliation team performed the reconciliation between the Mid Atlantic's ETF Omnibus Trading Account and the omnibus account held by a third-party custodian to confirm cash settlement transactions were processed completely and accurately. For a selection of days, inspected the daily reconciliation to ascertain that if there was a discrepancy equal to or greater than \$100, the discrepancy was researched and resolved. For a selection of months, inspected the monthly reconciliation file to ascertain that Management electronically evidences their review.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
9. Client Statements - Controls provide reasonable assurance that creation of and modifications to client statements are systematically generated and made available to clients completely, accurately, and in a timely manner.			
9.1	TNS reconciles security positions throughout the day against unaffiliated custodian and depository records and produces out-of-balance exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused an exception. Reconciling items in omnibus trading accounts must be properly addressed within one (1) business day. All other reconciling items are prioritized and addressed within one week. The Reconciliation Department Manager conducts a weekly review of all out-of-balance exceptions in omnibus trading accounts to ensure exceptions have been resolved on a timely basis.	Performed an observation to ascertain that TNS systematically reconciled security positions throughout the day against unaffiliated custodian and depository records and that out-of-balance exception reports were produced. For a selection of weeks, inspected the out-of-balance exception reports to ascertain that the Reconciliation Department Manager performed a review of all out-of-balance exceptions in omnibus trading accounts to confirm exceptions were resolved on a timely basis. For a selection of reconciling items, inspected that the exceptions in omnibus trading accounts were properly addressed within one business day and all other reconciling items were addressed within one week. If the reconciling items resided with the custodian, inspected that Reconciliation made contact timely and monitored until resolved.	No exceptions noted.
	For situations where reconciling items reside with the custodian, Reconciliation is responsible for the timely contact of the custodian and monitoring until resolved.		

Control Title	Control Activity	Test Procedures	Results of Tests
9.2	A Reconciliation Team member reconciles the cash balances and activity in customer bank accounts on a daily basis, and researches and resolves discrepancies. The Reconciliation manager reviews the reconciliation and the research and resolution of discrepancies on a monthly basis. The month end reconciliation is captured in TNS and electronically stored by the Reconciliation manager as evidence of review.	For a selection of days, inspected the cash reconciliations to ascertain that the Reconciliation team reconciled the cash balances and activity in customer bank accounts on a daily basis, and that discrepancies were researched and resolved, as necessary. For a selection of months, inspected the month end reconciliation to ascertain that the Reconciliation Manager performed a month end review.	No exceptions noted.
9.3	Monthly, starting after the third business day, the TNS automated statement publishing process initiates via the job scheduler. Statements are automatically published and made available via the TNS web portal when no issues exist. If an issue exists (e.g., unpriced security), the statement generation process log will create a list of open issues per account which must be resolved.	Observed and inspected TNS evidence to ascertain that the TNS systematically publishes client statements to the TNS web portal after the third business day of every month. Observed and inspected TNS evidence to ascertain if an issue exists (e.g., unpriced security), the statement generation process log will create a list of open issues per account which must be resolved prior to publishing the statement. For a selection of months and accounts, inspected the TNS web portal to ascertain that the statements were systematically published in a timely manner.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
9.4	Reconciliation reviews TNS statement publishing exception reports that identify the potential issues preventing a statement from publishing. Reconciliation tracks the resolution of identified issues and monitors the progress of the statement publishing process by viewing previous statement publishing process archived reports. Reconciliation is responsible for publishing statements for all active custody accounts monthly by the end of the subsequent month per internal standards.	Performed an observation of TNS to ascertain that Reconciliation tracked the resolution of identified issues and monitored the progress of the statement publishing process by viewing previous statement publishing process archived reports. Inspected the reconciliation group's tracking for a selection of months to ascertain that issues with statement publishing were resolved and that statements were published monthly by the end of the subsequent month.	No exceptions noted.
9.5	TNS performs an automated process daily to log all undeliverable emails. Trust Services generates a list of rejected emails from TNS quarterly to monitor and communicate the exceptions to Customers.	Observed and inspected TNS evidence to ascertain that TNS systematically log undeliverable emails. Inspected the Trust Services review for a sample of quarters to ascertain that rejected emails are monitored and communicated to customers.	No exceptions noted.
9.6	For Directed Trustee accounts requiring physical statements, once the published statement is available, on a quarterly basis the Operations team validates the pending statement is due in TNS to the contact for the account and will then print and mail the physical statement. This process is tracked by Operations via a control sheet.	For a selection of quarters and accounts, inspected the control sheet of accounts requiring papers statements to ascertain that delivery of mailed statements is tracked to completion in a timely manner.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
10. Client Transactions - Controls provide reasonable assurance that cash transactions and benefit distributions are authorized and processed accurately, timely and completely.			
10.1	Cash transactions manually entered into TNS by Asset Movement and Control associates are held in an "unreleased pending status" pending independent review and release. A second associate reviews pending transactions for authorization and accuracy prior to approving and releasing the transaction for processing. TNS electronically archives the user identification of the associate who entered the request and the second associate who verified the transaction.	Observed and inspected TNS evidence to ascertain that TNS systematically held transactions manually entered into TNS in an "unreleased pending status". For a selection of unreleased pending transactions, inspected TNS to ascertain that a second associated reviewed the transaction prior to approving/releasing for processing. Observed and inspected TNS evidence to ascertain that the TNS audit log systematically archives the user identification of the associate who entered the request and the second associate who reviewed and approved the transaction.	No exceptions noted.
10.2	For disbursement requests of \$25,000 or more manually entered into TNS directly by customers, TNS holds these requests in an "unreleased pending status" pending independent review and release by another external TNS user. TNS electronically archives the user identification of the associate who entered the request and the second associate who verified the transaction.	Observed and inspected TNS evidence to ascertain that TNS systematically holds manual disbursement requests on behalf of a client in an "unreleased pending status" for requests greater than \$25,000. Observed and inspected evidence of the TNS audit log to ascertain TNS systematically archives user identification of the associate who entered the request and the second associate who verified the transaction. For a selection of disbursement requests of \$25,000 or more, inspected TNS to ascertain that the request was entered by the customer directly, that it was independently reviewed, and released by another external TNS user.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
10.3	All check disbursement requests over \$150,000 require additional verification. The designated associate must send an email to the designated customer contact(s) verifying the amount and disbursement information. A tracking spreadsheet is maintained to document the transaction reference number, amount, customer, date, and the individual verifying the validity of the transaction.	Inspected additional disbursement verification requests over \$150,000 to ascertain that the designated customer contact verified the amount and disbursement information. Inspected the disbursement tracking spreadsheet to ascertain that check disbursements are being tracked.	No exceptions noted.
10.4	An authorized Operations officer reviews all check disbursements for amounts greater than \$100,000. TNS electronically archives the user identification. The image of the disbursement check, once it clears the bank, is posted to the respective BIN # for access by the Customer. An "un-cashed check" report is available to Customers through TNS.	For a selection of disbursements greater than \$100,000, inspected the signed check to ascertain that it was reviewed and approved by an authorized officer. For a selection of disbursement checks, inspected evidence that an image of the check was posted to TNS. Observed and inspected TNS evidence to ascertain that an "un-cashed check" report is available to Customers through TNS.	No exceptions noted.
10.5	On a quarterly basis, Asset Movement and Control submits the payee information relating to aged, outstanding checks to a third-party provider for additional location services.	For a sample of quarters, inspected Asset Movement and Control's submission of payee information relating to aged, outstanding checks to ascertain that the checks were provided to a third party for additional location services.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
10.6	An employee receives all returned distribution checks which are recorded on an electronic spreadsheet and forwarded to Asset Movement and Control to address. Asset Movement and Control maintains an independent record of returned checks which are used to document its final disposition. Asset Movement and Control uploads the spreadsheet into TNS to reflect the returned item and the reason for the return. Customers monitor the returned items report on TNS as they are responsible for research and resolution. Asset Movement & Control maintains the returned checks in a safe until final disposition.	For a selection of checks, inspected the returned distribution checks list to ascertain that all returned distribution checks were recorded accurately and completely on an electronic spreadsheet by an employee and forwarded to Asset Movement and Control for addressing purposes. For a selection of checks, inspected the independent record file/ list maintained by Asset Movement and Control to ascertain that all returned distribution checks are maintained in the file/ list and final disposition details are documented. For a selection of checks, inspected evidence that Asset Movement and Control updated the item in TNS to ascertain that TNS reflects the reason for the return. Performed an observation of the safe to ascertain that Asset Movement & Control maintained the returned checks in a safe until final disposition.	No exceptions noted.
10.7	A Reconciliation Team member reconciles the cash balances and activity in customer bank accounts on a daily basis, and researches and resolves discrepancies. The Reconciliation manager reviews the reconciliation and the research and resolution of discrepancies on a monthly basis. The month end reconciliation is captured in TNS and electronically stored by the Reconciliation manager as evidence of review.	For a selection of days, inspected the cash reconciliations to ascertain that the Reconciliation team reconciled the cash balances and activity in customer bank accounts on a daily basis, and that discrepancies were researched and resolved, as necessary. For a selection of months, inspected the month end reconciliation to ascertain that the Reconciliation Manager performed a month end review.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
11. Unitized Funds - Controls provide reasonable assurance that net asset values for assets held in unitized funds specifically created for a trust client ("Unitized Funds") are calculated and reviewed in a complete, accurate, and timely manner using prices obtained from authorized independent sources.			
11.1	MATC receives the NSCC Profile 1 file electronically to update TNS daily with mutual fund prices and rates. Mid Atlantic also receives electronic price files (consolidated closing price) daily from a third-party vendor for ETFs and other equity securities.	Observed and inspected TNS evidence to ascertain that mutual fund prices and rates are updated in TNS based on NSCC Profile 1 file received electronically.	No exceptions noted.
	If a price for any security is not received, the statement for the account holding that security will not publish. During the statement publishing process, TNS flags the account and the account appears on exception reports that are utilized by Reconciliation to research, record, or adjust the activity that caused an exception.	Observed and inspected TNS evidence to ascertain that closing price for ETFs and other equity securities are updated in TNS based on the daily electronic price files received from third party vendor.	
		Observed and inspected TNS evidence to ascertain that TNS systematically does not publish an account statement if a price for any security associated with that account is not received.	
		Observed and inspected TNS evidence to ascertain that the Reconciliation team researched and resolved exceptions based on the statement publishing exception reports.	

Control Title	Control Activity	Test Procedures	Results of Tests
11.2	TNS publishes daily statements for all unitized funds. TNS automatically calculates the daily Net Asset Value (NAV) by taking the current asset market value, plus any accrued income, minus the current asset market value, plus any accrued income, minus any accrued fees and divide by the number of outstanding units. Once the NAV is established, trades entered for the day are settled. Trust Trading monitors multiple daily unpublished statement reports as well as unconfirmed unit trade reports to ensure all statements are published daily and all unit activity is settled.	Observed and inspected TNS evidence to ascertain that TNS systematically calculated the NAV by taking the current asset market value, plus any accrued income, minus any accrued fees and divided by the number of outstanding units. For a selection of unitized funds, inspected TNS to ascertain that the daily fund statement was published in a complete, and timely manner. For a selection of unitized funds, reperformed the automated NAV calculation to ascertain the NAV was systematically calculated in a complete and accurate manner. For a selection of asset market values, inspected the asset market value in TNS and compared the value to the pricing source to ascertain that market values used in the NAV were accurate. For a selection of days, inspected evidence of Trust Trading's monitoring of unpublished statement reports and unconfirmed unit trade reports to ascertain that all statements were published and all unit activity was settled.	No exceptions noted.
11.3	An issue is created on the TNS homepage when a unitized fund price has increased or decreased more than 5% from the prior day. Designated Trust Trading associates investigate the Issue to ensure that the price fluctuation is not the result of a pricing error. The issues are identified, researched, and resolved. TNS tracks the status of the issue and the associate who claimed and resolved the issue.	Observed and inspected TNS to ascertain that TNS systematically created an issue on the homepage when a unitized fund price increased or decreased more than 5% from the prior day. For a selection of issues, inspected TNS to ascertain that the issue was identified, researched and resolved. For a selection of issues, inspected the TNS audit log to ascertain that TNS tracked the status of the issue and the associate who claimed/resolved the issue.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
11.4	TNS automatically sweeps any residual cash balances less than or equal to \$250 in the unitized fund back to the retirement plan account. Trust Trading continues to monitor the report and for any residual balances exceeding the system threshold of \$250, and manually sweeps the residual shares back to the retirement plan that held the unitized fund.	Observed and inspected TNS evidence to ascertain that TNS systematically swept any residual cash balances less than or equal to \$250 in the unitized fund back to the retirement plan account. For a selection of issues, inspected TNS evidence to ascertain that Trust Trading monitored the TNS report and manually swept any residual shares exceeding the system threshold of \$250 back to the retirement plan that held the unitized fund.	No exceptions noted.

Control Title	Control Activity	Test Procedures	Results of Tests
12. Customer Fee Billing and Accounting - Controls provide reasonable assurance that trust fees are approved, calculated and recorded in a complete, accurate, and timely manner.			
12.1	An RM separate from the fee creating or modifying the fee schedule documents their review and approval of the new or modified fee schedule.	For a selection of new or modified fee schedules, inspected the Relationship Manager's review to ascertain that it was separate from the Relationship Manager that created or modified the fee schedule. For a selection of new or modified fee schedules, reperformed the Relationship Manager's review of the fee schedule established in TNS to the signed client agreement to ascertain that fees were setup accurately.	No exceptions noted.
12.2	TNS runs an automated process at the beginning of each month to identify billable items and calculates the amounts due based on the established fee schedules for the prior month.	Observed and inspected TNS evidence to ascertain that TNS ran an automated process at the beginning of each month to identify billable items and calculated the amounts due based on the established fee schedules for the prior month. For a sample automated fee calculation, reperformed the automated fee calculation based on the fee schedule to ascertain the fee was calculated in an accurate manner.	No exceptions noted.
12.3	At the end of the month a RM reviews fee schedule adjustments and confirms that the monthly invoicing cycle has properly accounted for the new or modified fee schedule accurately and completely.	For a selection of months, inspected the Relationship Manager's review that the monthly invoicing cycle accounted for new or modified fee schedules to ascertain that the review was performed.	No exceptions noted.

Section V: Other Information Provided by Mid Atlantic

Section V: Other Information Provided by Mid Atlantic

The information included in Section V of this report is presented by Mid Atlantic Trust Company ("MATC"), Mid Atlantic Clearing & Settlement Corporation ("MAC&SC"), and EdgeCo Holdings ("EdgeCo") to provide additional information to user entities and is not part of Mid Atlantic's description of the system. The information included here in Section V has not been subjected to the procedures applied in the examination of the description of the system related to MATC, and, accordingly, Deloitte & Touche LLP expresses no opinion on it.

Management's Response to Testing Exception

Testing Exception Noted – Control Objective 6		
Asset Establishment		
1.	Applicable Control Objective(s):	Objective 6: Controls provide reasonable assurance that new securities and changes to existing securities are authorized, set up, and maintained in a complete, accurate, and timely manner.
	Applicable Control Activity(s):	Control 6.1: When first established, the trading indicator for new securities is systematically coded "not tradable". Taskmaster suspends the account setup process when a user attempts to add a security coded "not tradable". Fund Services claims the task and reviews the security to determine whether the security is NSCC eligible (mutual funds) and whether all required selling agreements and documentation is in place. Once approved, Fund Services updates the trading indicator in TNS to "tradable".
	Exception Identified:	For 1 out of 40 tasks, the security was inappropriately coded as "tradable" in TNS.
	Management's Response:	The security was flipped to tradable due to human error misinterpreting a fund company's notification of fund name changes and new security issuances. No account setups had occurred in the security sampled. No accounts invested in the security during the period that the trading indicator was coded as "tradable" and the misinterpretation of the notification of fund name changes only affected the one security. Additionally, fund companies and their agents are responsible for rejecting an account opening request if a security is not covered by our selling agreements. Generally, Mid Atlantic selling agreements cover all securities that a mutual fund company offers, so remediation would likely entail an updated amendment including any newly issued securities. In the event the fund's own controls fail to detect this condition, it would be incumbent on the fund to determine the appropriate remediation.

Encryption

TNS employs a data encryption protocol when transmitting data electronically to a third party. In addition, once data has been processed within TNS, it is stored in TNS encrypted.

Business Continuity and Disaster Recovery

The Company maintains a written Enterprise Resiliency Program that is reviewed and approved by executive management on an annual basis. The Enterprise Resiliency Program includes departmental business continuity/disaster recovery ("BC-DR") plans. The Enterprise Resiliency Program details the procedures that should be followed for various events ranging from natural disaster to safety concerns. The Enterprise Resiliency Program is made available to all employees via a shared network and is subject to annual review and approval.

Each department is responsible for maintaining, reviewing and approving its BC-DR plan. Departments are required to review, approve and test their plans annually; however, testing may occur more frequently based on the discretion of department leaders. A cloud-based software solution (Fusion) has been licensed for storage of departmental plans, testing dates, and testing results.

EdgeCo also maintains a secondary data center location for disaster recovery purposes. Data is backed up to multiple servers at the main data center. Data is also simultaneously transmitted from the main data center to the disaster recovery site through direct connectivity.

Privacy Program

EdgeCo has a privacy program that focuses on the Company's compliance with laws and regulations concerning the collection, use, and disclosure of personal information, as well as policies and procedures for protecting the security and confidentiality of that information. A firm-wide privacy notice is reviewed annually with each applicable business group and applicable changes in laws regulations and business practices are reflected in the notice. The privacy notice is distributed to applicable customers at the time an account is established and at least annually thereafter.

Corporation Records Management

MATC, MAC&SC, and EdgeCo employees handle many records and information assets in the normal course of business. Every employee has a responsibility to manage these valuable assets to satisfy all regulatory, legal, and business requirements. Employees must ensure that records are accessible for the prescribed retention period, and protect the authenticity and integrity.

The Company maintains written record retention policies to ensure each company's records and information assets are managed in accordance with legal, regulatory, and business requirements. These policies were developed to provide a comprehensive, efficient, and standardized approach to the identification and retention of all official business records of the Group, regardless of the media or format. The policies are designed to enable each company to manage their records to satisfy federal and state regulating authorities, including but not limited to the SEC, FINRA, Department of Labor, IRS and South Dakota Division of Banking.

Anti-Money Laundering Certification

Mid Atlantic has established and implemented anti-money laundering (AML) programs (collectively, "AML Program") that are reasonably designed to comply with the Bank Secrecy Act of 1970, as amended by the USA PATRIOT Act of 2001 and other laws, and regulations (collectively, the "BSA"), as applicable. The AML Program includes, but is not limited to, independent testing of the AML program and the establishment and operation of a customer identification program.

QTA & Force Outs

MATC defines abandoned property as retirement plans on TNS which are no longer associated with a third-party administrator or record-keeper or uncashed disbursement checks.

Abandoned Plans

MATC is not obligated to determine whether a plan has been abandoned since, in substantially all cases, MATC does not have access to sufficient information to make the determination as to whether a plan is abandoned versus inactive. MATC, however, does monitor plan activity against certain criteria to assist its customers in determining whether a plan potentially meets the definition of an abandoned plan. The ultimate determination of plan abandonment can be rendered only by the Department of Labor.

In addition, the Company maintains a written policy and procedure governing abandoned plans which requires the preparation and distribution of a report of all "inactive plans", as internally defined, to each customer on a semi-annual basis.

In conjunction with its affiliated trust company, MATC began providing qualified termination administration ("QTA") services to plans as of Q3 of 2018. The QTA services are offered under the Department of Labor safe harbor and provide a structured approach to winding down retirement plans that no longer have an active plan sponsor. Mid Atlantic performs outreach to plan participants to provide distribution of account balances. Unresponsive participants are deemed "lost" and Mid Atlantic will establish a lost participant IRA on its books and records

COVID Pandemic Response

EdgeCo's Public Health Risk and Pandemic Preparedness and Response Plan ("Plan") provides information on the program implemented and maintained by EdgeCo Holdings ("EdgeCo" or "Company") to mitigate public health risks in the workplace and to appropriately respond to anticipated or actual public health risks that have the potential to affect Company operations. This may include pandemic events.

EdgeCo adopts this Plan to prepare for and respond to public health risks, including influenza, COVID-19 or other epidemic or pandemic, that cause serious widespread illness. This Plan is intended as a supplement to, not a replacement of, the Company's existing Business Continuity and Disaster Recovery Plan(s).

This Plan applies across EdgeCo, the parent company of EdgeCo Holdings, Inc. and New Edge Capital Group, LLC, and their subsidiaries. EdgeCo Holdings, Inc. subsidiaries include, among others, Mid Atlantic Capital Group, Inc., Mid Atlantic Trust Company, MAC&SC, American Trust Company, and AT Retirement Services, LLC. NewEdge Capital Group, LLC subsidiaries include, among others, NewEdge Advisors, LLC, NewEdge Wealth, LLC, NewEdge Securities, Inc., and LPA Insurance Agency.

The purpose of this Plan is to address the following issues related to public health risks that present the potential to affect Company operations:

- Reinforcing infection control in the workplace, including, if possible, options for working offsite while ill, systems to reduce infection transmission and worker education.
- Establishing contingency plans to maintain delivery of services during times of significant and sustained worker absenteeism.
- Where possible, establishing mechanisms to allow workers to provide services from home if public health officials advise against non-essential travel outside the home.
- Establishing partnerships with other members of the financial community to provide mutual support and maintenance of essential services during a pandemic.

The appointed Coordinator shall collaborate with Human Resources to develop a plan to keep employees, including those who remain at home, informed of developments as they occur. This could include plans to obtain home email addresses and cell phone numbers, sending alerts via AlertMedia or similar, telephone numbers for employees to call in order to receive recorded messages, pages on the website for employees and other similar measures, as appropriate. The plan should also include procedures for responding promptly to employees' questions about such issues as whether to report to the office and special hours of operations during an outbreak of illness.

Testing Our Plan

The Executive Committee directs and authorizes the Coordinator to conduct an annual assessment of this Plan and submit resultant findings to the Executive Committee with the Coordinator's and individual Managers' responses to exceptions.

**Administrative Office:**

Mid Atlantic Trust Company
1251 Waterfront Place, Suite 525
Pittsburgh, PA 15222-4236

Account Information For:**CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust****For the Period 01/01/2022 through 12/31/2022****Notes:**

Mid Atlantic Trust Company ("MATC"), in its capacity as custodian of the assets of the above referenced account hereby certifies that, with respect to the assets held in custody with MATC, the enclosed account statement accurately reflects the positions held in the account based on a review of MATC as of this statement period. Please note some assets shown on this statement may not be in custody with MATC. Such items may be held away and are reported as sundry assets as a courtesy and convenience. As an authorized representative of MATC, I certify on behalf of MATC that the information furnished to the Plan Administrator pursuant to 29 CFR 2520.103-5(c) is complete and accurate.

A handwritten signature in dark ink, reading 'Paul D. Schneider'.

Paul D. Schneider

Account Summary

Beginning Market Value	4,716,244.28
Undefined	-3,844,152.84
Income	11,852.53
Investment Activity	-883,942.67
Net Change in Market Value	-4,716,242.98
Ending Market Value	1.30



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Market Value Reconciliation

Beginning Market Value		4,716,244.28
Undefined		
Undefined	-3,844,152.84	
		-3,844,152.84
Income		
Dividend	11,852.53	
		11,852.53
Investment Activity		
Purchase of Investments	0.00	
Redemption of Investments	-667,589.94	
Short Term Gain Distributions	0.06	
Long Term Gain Distributions	0.29	
Securities Transferred In	11.75	
Securities Transferred Out	-218,330.04	
Transferred Appreciation / Depreciation	1,958.23	
Unrealized Appreciation / Depreciation	6.98	
		-883,942.67
Net Change in Market Value		-4,716,242.98
Ending Market Value		1.30



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Cash Reconciliation

Beginning Cash Balance		0.40
Undefined		
Undefined	-3,844,152.84	
		-3,844,152.84
Income		
Dividend	1,105.77	
		1,105.77
Investment Activity		
Purchase of Investments	-50,858.18	
Redemption of Investments	3,893,904.85	
Short Term Gain Distributions	0.00	
Long Term Gain Distributions	0.00	
Securities Transferred In	0.00	
Securities Transferred Out	0.00	
Transferred Appreciation / Depreciation	0.00	
Unrealized Appreciation / Depreciation		
		3,843,046.67
Net Change in Cash		-0.40
Ending Cash Balance		0.00



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Asset Listing

Security	Description	Beginning Shares	Price	Beginning Market Value	Ending Shares	Price	Ending Market Value
Cash & Equivalents							
CASH	Mid Atlantic Master Cash Account			0.40			-
Total	Cash & Equivalents			0.40			-
Equity Fund							
233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	10,370.334	46.0600	477,657.60	-	41.5000	-
24610A505	Delaware Smid Cap Growth Fund Class R6	4,025.269	49.0700	197,519.95	-	23.6500	-
399874817	American Funds The Growth Fund of America Class R-6	7,967.600	74.3600	592,470.74	-	49.5100	-
4812C2288	JPMorgan Mid Cap Growth Fund Class R6	5,579.241	53.8500	300,442.13	-	39.0500	-
56064L272	MainStay CBRE Real Estate Fund Class A	0.118	14.9600	1.77	0.1690	7.6800	1.30
759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0	1,162.893	185.8600	216,135.29	-	190.4700	-
94987W513	Allspring Special Mid Cap Value Fund - Class R6	4,051.565	50.6000	205,009.19	-	44.4100	-
94988A668	Allspring Special Small Cap Value Fund - Class R6	8,676.276	43.7400	379,500.31	-	35.5300	-
Total	Equity Fund			2,368,736.98			1.30
International Equity Fund							
233203371	DFA International Core Equity Portfolio Institutional Class	27,252.179	16.1000	438,760.07	-	13.5100	-
233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	19,282.985	25.0400	482,845.95	-	20.1400	-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Asset Listing

Security	Description	Beginning Shares	Price	Beginning Market Value	Ending Shares	Price	Ending Market Value
International Equity Fund							
23320G554	DFA Global Real Estate Securities Portfolio	8,393.904	13.4500	112,898.01	-	9.7100	-
298706862	American Funds EuroPacific Growth Fund Class R-2	0.001	61.9100	0.06	-	46.7100	-
Total	International Equity Fund			1,034,504.09			-
Fixed Income Fund							
01853W808	AB Global Bond Fund Class Z	9,162.125	8.2800	75,862.39	-	6.7200	-
057071854	Baird Aggregate Bond Fund Class Institutional	49,063.468	11.3700	557,851.63	-	9.6000	-
09260B614	BlackRock High Yield Bond Portfolio Class K	30,213.771	7.8400	236,875.96	-	6.6400	-
Total	Fixed Income Fund			870,589.98			-
Balanced Fund							
024071862	American Funds American Balanced Fund Class R-2	0.001	33.2200	0.03	-	28.5500	-
921909206	Vanguard LifeStrategy Income Fund Investor Shares	216.210	16.9600	3,666.92	-	14.3100	-
921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	269.042	23.0700	6,206.80	-	19.0800	-
921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	10,162.500	33.5400	340,850.24	-	27.4400	-
921909503	Vanguard LifeStrategy Growth Fund Investor Shares	148.361	44.4300	6,591.67	-	36.0300	-
Total	Balanced Fund			357,315.66			-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Asset Listing

Security	Description	Beginning Shares	Price	Beginning Market Value	Ending Shares	Price	Ending Market Value
Commodity Fund							
23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	17,990.946	4.7300	85,097.17	-	4.9100	-
Total	Commodity Fund			85,097.17			-
Total For Account				4,716,244.28			1.30



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Undefined							
	Undefined						
	1/4/22	Settlement To PAYSWEET			-	(1,159.22)	(1,159.22)
	1/4/22	Settlement To PAYSWEET			-	(672.68)	(672.68)
	1/4/22	Settlement To PAYSWEET			-	(150.01)	(150.01)
	1/6/22	Settlement To PAYSWEET			-	266.15	266.15
	1/6/22	Settlement To PAYSWEET			-	1,458.05	1,458.05
	1/6/22	Settlement To PAYSWEET			-	1,525.94	1,525.94
	1/6/22	Settlement To PAYSWEET			-	4,379.67	4,379.67
	1/6/22	Settlement To PAYSWEET			-	6,939.17	6,939.17
	1/7/22	Settlement To PAYSWEET			-	(5,286.87)	(5,286.87)
	1/24/22	Settlement To PAYSWEET			-	2,752.68	2,752.68
	1/24/22	Settlement To PAYSWEET			-	3,363.89	3,363.89
	1/24/22	Settlement To PAYSWEET			-	6,669.39	6,669.39
	1/26/22	Settlement To PAYSWEET			-	(4,362.50)	(4,362.50)
	1/26/22	Settlement To PAYSWEET			-	(40.98)	(40.98)
	1/26/22	Settlement To PAYSWEET			-	(25.14)	(25.14)
	2/2/22	Settlement To PAYSWEET			-	(1,091.39)	(1,091.39)
	2/2/22	Settlement To PAYSWEET			-	(664.62)	(664.62)
	2/2/22	Settlement To PAYSWEET			-	(143.52)	(143.52)
	2/17/22	Settlement To PAYSWEET			-	(5,040.79)	(5,040.79)
	2/17/22	Settlement To PAYSWEET			-	(3,226.81)	(3,226.81)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Undefined							
	Undefined						
	2/17/22	Settlement To PAYSWEET			-	(145.20)	(145.20)
	2/17/22	Settlement To PAYSWEET			-	0.40	0.40
	2/17/22	Settlement To PAYSWEET			-	1.59	1.59
	2/24/22	Settlement To PAYSWEET			-	261.50	261.50
	2/24/22	Settlement To PAYSWEET			-	278.39	278.39
	2/24/22	Settlement To PAYSWEET			-	625.55	625.55
	2/25/22	Settlement To PAYSWEET			-	(6,356.61)	(6,356.61)
	2/25/22	Settlement To PAYSWEET			-	(3,224.66)	(3,224.66)
	2/25/22	Settlement To PAYSWEET			-	(1,529.99)	(1,529.99)
	2/28/22	Settlement To PAYSWEET			-	(1,025.64)	(1,025.64)
	3/1/22	Settlement To PAYSWEET			-	(41.47)	(41.47)
	3/1/22	Settlement To PAYSWEET			-	(25.05)	(25.05)
	3/1/22	Settlement To PAYSWEET			-	(5.33)	(5.33)
	3/2/22	Settlement To PAYSWEET			-	(1,077.79)	(1,077.79)
	3/2/22	Settlement To PAYSWEET			-	(652.54)	(652.54)
	3/2/22	Settlement To PAYSWEET			-	(140.23)	(140.23)
	3/7/22	Settlement To PAYSWEET			-	139.22	139.22
	3/7/22	Settlement To PAYSWEET			-	306.14	306.14
	3/7/22	Settlement To PAYSWEET			-	312.77	312.77
	3/9/22	Settlement To PAYSWEET			-	(15,076.19)	(15,076.19)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Undefined							
	Undefined						
	3/9/22	Settlement To PAYSWEET			-	(2,564.62)	(2,564.62)
	3/9/22	Settlement To PAYSWEET			-	(0.03)	(0.03)
	3/9/22	Settlement To PAYSWEET			-	17,640.78	17,640.78
	3/21/22	Settlement To PAYSWEET			-	139.26	139.26
	3/21/22	Settlement To PAYSWEET			-	255.78	255.78
	3/21/22	Settlement To PAYSWEET			-	312.72	312.72
	3/22/22	Settlement To PAYSWEET			-	(41.30)	(41.30)
	3/22/22	Settlement To PAYSWEET			-	(25.20)	(25.20)
	3/22/22	Settlement To PAYSWEET			-	(5.34)	(5.34)
	4/4/22	Settlement To PAYSWEET			-	(1,076.77)	(1,076.77)
	4/4/22	Settlement To PAYSWEET			-	(658.40)	(658.40)
	4/4/22	Settlement To PAYSWEET			-	(139.67)	(139.67)
	4/6/22	Settlement To PAYSWEET			-	139.22	139.22
	4/6/22	Settlement To PAYSWEET			-	255.77	255.77
	4/6/22	Settlement To PAYSWEET			-	312.77	312.77
	4/21/22	Settlement To PAYSWEET			-	139.24	139.24
	4/21/22	Settlement To PAYSWEET			-	255.77	255.77
	4/21/22	Settlement To PAYSWEET			-	312.75	312.75
	4/22/22	Settlement To PAYSWEET			-	(41.07)	(41.07)
	4/22/22	Settlement To PAYSWEET			-	(25.47)	(25.47)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Undefined							
	Undefined						
	4/22/22	Settlement To PAYSWEET			-	(5.34)	(5.34)
	5/3/22	Settlement To PAYSWEET			-	(1,004.03)	(1,004.03)
	5/3/22	Settlement To PAYSWEET			-	(623.32)	(623.32)
	5/3/22	Settlement To PAYSWEET			-	(131.16)	(131.16)
	5/6/22	Settlement To PAYSWEET			-	139.25	139.25
	5/6/22	Settlement To PAYSWEET			-	255.78	255.78
	5/6/22	Settlement To PAYSWEET			-	312.73	312.73
	5/24/22	Settlement To PAYSWEET			-	(21,856.51)	(21,856.51)
	5/24/22	Settlement To PAYSWEET			-	(25.94)	(25.94)
	5/24/22	Settlement To PAYSWEET			-	(5.40)	(5.40)
	5/24/22	Settlement To PAYSWEET			-	0.09	0.09
	5/25/22	Settlement To PAYSWEET			-	(2,037,943.55)	(2,037,943.55)
	5/25/22	Settlement To PAYSWEET			-	(1,469,213.71)	(1,469,213.71)
	5/25/22	Settlement To PAYSWEET			-	(306,296.05)	(306,296.05)
	5/26/22	Settlement To PAYSWEET			-	(1,004.53)	(1,004.53)
	5/26/22	Settlement To PAYSWEET			-	(101.24)	(101.24)
	5/31/22	Settlement To PAYSWEET			-	1,105.77	1,105.77
	6/1/22	Settlement To PAYSWEET			-	-	-
	6/15/22	Settlement To PAYSWEET			-	(1,056.45)	(1,056.45)
	9/15/22	Settlement To PAYSWEET			-	(0.28)	(0.28)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Undefined							
	Undefined						
	9/15/22	Settlement To PAYSWEEP			-	(0.01)	(0.01)
	10/20/22	Closing Out Account Transfer To: MATCHOLD			-	(0.40)	(0.40)
	Total	Undefined			-	(3,844,152.84)	(3,844,152.84)
Total	Undefined				-	(3,844,152.84)	(3,844,152.84)
Income							
	Dividend						
	1/25/22	057071854 Baird Aggregate Bond Fund Class Institutional (Rate: 0.014195550 per share)	62.893	11.1300	700.00	-	700.00
	1/31/22	01853W808 AB Global Bond Fund Class Z	11.635	8.1300	94.59	-	94.59
	1/31/22	09260B614 BlackRock High Yield Bond Portfolio Class K	120.506	7.6100	917.05	-	917.05
	2/24/22	057071854 Baird Aggregate Bond Fund Class Institutional (Rate: 0.018757870 per share)	85.097	10.8500	923.30	-	923.30
	2/28/22	01853W808 AB Global Bond Fund Class Z	11.166	7.9900	89.22	-	89.22
	2/28/22	09260B614 BlackRock High Yield Bond Portfolio Class K	114.550	7.5100	860.27	-	860.27
	3/25/22	057071854 Baird Aggregate Bond Fund Class Institutional (Rate: 0.017971580 per share)	84.139	10.5000	883.46	-	883.46
	3/28/22	921909206 Vanguard LifeStrategy Income Fund Investor Shares (Rate: 0.048600000 per share) Record Date: 3/25/2022 Paid On: 220.901 shrs Rate: 0.049 Reinvest Price: 15.89	0.676	15.8900	10.74	-	10.74



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Income							
	Dividend						
	3/28/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares (Rate: 0.060700000 per share) Record Date: 03/25/2022 Paid On: 274.688 shrs Rate: 0.061 Reinvest Price: 21.67	0.769	21.6700	16.67	- 16.67
	3/30/22	233203371	DFA International Core Equity Portfolio Institutional Class (Rate: 0.023040000 per share) Record Date: 3/29/2022 Paid On: 27,205.297 shrs Rate: 0.023 Reinvest Price: 15.54	40.335	15.5400	626.81	- 626.81
	3/30/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class (Rate: 0.025480000 per share) Record Date: 3/29/2022 Paid On: 19,274.991 shrs Rate: 0.025 Reinvest Price: 24.31	20.203	24.3100	491.13	- 491.13
	3/30/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class (Rate: 0.200620000 per share) Record Date: 3/29/2022 Paid On: 10,351.694 shrs Rate: 0.201 Reinvest Price: 46.53	44.633	46.5300	2,076.76	- 2,076.76
	3/31/22	01853W808	AB Global Bond Fund Class Z	13.826	7.8200	108.12	- 108.12
	3/31/22	09260B614	BlackRock High Yield Bond Portfolio Class K	140.382	7.4400	1,044.44	- 1,044.44
	3/31/22	56064L272	MainStay CBRE Real Estate Fund Class A (Rate: 0.092200000 per share)	0.001	13.8300	0.01	- 0.01
	4/25/22	057071854	Baird Aggregate Bond Fund Class Institutional (Rate: 0.018073860 per share)	86.908	10.2400	889.94	- 889.94
	4/29/22	01853W808	AB Global Bond Fund Class Z	14.703	7.5800	111.45	- 111.45



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Income								
	Dividend							
	4/29/22	09260B614	BlackRock High Yield Bond Portfolio Class K	142.083	7.1500	1,015.89	-	1,015.89
	5/24/22	057071854	Baird Aggregate Bond Fund Class Institutional (Rate: 0.020370110 per share)	98.387	10.2100	1,004.53	-	1,004.53
5/24/22	5/25/22	057071854	Baird Aggregate Bond Fund Class Institutional (Rate: 0.020370110 per share) Reversal of #457013733	(98.387)	10.2100	(1,117.79)	-	(1,117.79)
5/24/22	5/26/22	057071854	Baird Aggregate Bond Fund Class Institutional (Rate: 0.020370110 per share)	-	-	-	1,004.53	1,004.53
5/25/22	5/26/22	01853W808	AB Global Bond Fund Class Z	-	-	-	101.24	101.24
5/31/22	6/1/22	09260B614	BlackRock High Yield Bond Portfolio Class K 859.15 sent by fund directly to client	-	-	-	-	-
	6/28/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares (Rate: 0.105400000 per share) Record Date: 06/27/2022 Paid On: 0.000 shrs Rate: 0.105	-	19.6000	-	-	-
	6/28/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares (Rate: 0.320700000 per share) Record Date: 06/27/2022 Paid On: 0.000 shrs Rate: 0.321	-	36.3000	-	-	-
	6/29/22	233203371	DFA International Core Equity Portfolio Institutional Class (Rate: 0.173560000 per share) Record Date: 06/28/2022 Paid On: 0.000 shrs Rate: 0.174	-	13.1300	-	-	-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Income							
	Dividend						
	6/29/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class (Rate: 0.182080000 per share) Record Date: 06/28/2022 Paid On: 0.001 shrs Rate: 0.182	-	21.2300	-	-
	6/30/22	01853W808	AB Global Bond Fund Class Z	0.016	7.3700	0.12	- 0.12
	6/30/22	56064L272	MainStay CBRE Real Estate Fund Class A (Rate: 0.219100000 per share)	0.003	11.4700	0.03	- 0.03
	9/30/22	56064L272	MainStay CBRE Real Estate Fund Class A (Rate: 0.100100000 per share)	0.001	10.1900	0.01	- 0.01
	12/7/22	56064L272	MainStay CBRE Real Estate Fund Class A (Rate: 0.041399000 per share)	0.001	7.8800	0.01	- 0.01
	Total	Dividend			10,746.76	1,105.77	11,852.53
Total Income					10,746.76	1,105.77	11,852.53
Investment Activity							
	Purchase of Investments						
1/5/22	1/6/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120058005681	18.609	8.2200	152.97	(152.97) -
1/5/22	1/6/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120058005699	0.966	8.2200	7.94	(7.94) -
1/5/22	1/6/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120058005665	113.440	11.2400	1,275.07	(1,275.07) -



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
1/5/22	1/6/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120058005673	8.141	11.2400	91.51	(91.51)	-
1/5/22	1/6/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120058005707	106.095	7.8100	828.60	(828.60)	-
1/5/22	1/6/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120058005715	6.297	7.8100	49.18	(49.18)	-
1/5/22	1/6/22	233203371	DFA International Core Equity Portfolio Institutional Class	49.183	16.1400	793.81	(793.81)	-
1/5/22	1/6/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.291	16.1400	53.11	(53.11)	-
1/5/22	1/6/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	29.438	24.8700	732.13	(732.13)	-
1/5/22	1/6/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.647	24.8700	40.96	(40.96)	-
1/5/22	1/6/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	19.205	46.6900	896.70	(896.70)	-
1/5/22	1/6/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.797	46.6900	37.20	(37.20)	-
1/5/22	1/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	26.705	4.8200	128.72	(128.72)	-
1/5/22	1/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.645	4.8200	7.93	(7.93)	-
1/5/22	1/6/22	23320G554	DFA Global Real Estate Securities Portfolio	22.433	13.0800	293.43	(293.43)	-
1/5/22	1/6/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120058005624	9.783	44.8200	438.46	(438.46)	-
1/5/22	1/6/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120058005632	0.678	44.8200	30.39	(30.39)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
1/5/22	1/6/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120058005566	19.901	71.8800	1,430.45	(1,430.45)	-
1/5/22	1/6/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120058005574	0.644	71.8800	46.30	(46.30)	-
1/5/22	1/6/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120058005582	19.120	50.7700	970.72	(970.72)	-
1/5/22	1/6/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120058005590	0.368	50.7700	18.70	(18.70)	-
1/5/22	1/6/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120058005723	3.008	185.9100	559.30	(559.30)	-
1/5/22	1/6/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120058005731	0.077	185.9100	14.38	(14.38)	-
1/5/22	1/6/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	5.056	16.8000	84.94	(84.94)	-
1/5/22	1/6/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	6.099	22.8300	139.25	(139.25)	-
1/5/22	1/6/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	124.276	33.1700	4,122.24	(4,122.24)	-
1/5/22	1/6/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	5.463	33.1700	181.21	(181.21)	-
1/5/22	1/6/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	2.693	43.8900	118.18	(118.18)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
1/5/22	1/6/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120058005608	10.138	50.6800	513.80	(513.80)	-
1/5/22	1/6/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120058005616	0.704	50.6800	35.69	(35.69)	-
1/5/22	1/6/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120058005640	10.372	44.0600	457.01	(457.01)	-
1/5/22	1/6/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120058005657	0.424	44.0600	18.70	(18.70)	-
						01/06/2022 Total:	(14,568.98)	
1/21/22	1/24/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120217073653	21.293	8.1800	174.18	(174.18)	-
1/21/22	1/24/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120217073661	0.969	8.1800	7.93	(7.93)	-
1/21/22	1/24/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120217073638	138.547	11.1700	1,547.57	(1,547.57)	-
1/21/22	1/24/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120217073646	8.194	11.1700	91.53	(91.53)	-
1/21/22	1/24/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120217073679	89.903	7.7000	692.25	(692.25)	-
1/21/22	1/24/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120217073687	6.387	7.7000	49.18	(49.18)	-
1/21/22	1/24/22	233203371	DFA International Core Equity Portfolio Institutional Class	67.728	15.7100	1,064.01	(1,064.01)	-
1/21/22	1/24/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.381	15.7100	53.11	(53.11)	-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
1/21/22	1/24/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	26.817	25.0900	672.83	(672.83)	-
1/21/22	1/24/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.633	25.0900	40.97	(40.97)	-
1/21/22	1/24/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	22.018	44.6700	983.54	(983.54)	-
1/21/22	1/24/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.833	44.6700	37.20	(37.20)	-
1/21/22	1/24/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	36.456	5.0000	182.28	(182.28)	-
1/21/22	1/24/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.588	5.0000	7.94	(7.94)	-
1/21/22	1/24/22	23320G554	DFA Global Real Estate Securities Portfolio	25.948	12.4100	322.01	(322.01)	-
1/21/22	1/24/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120217073596	11.478	37.8100	434.00	(434.00)	-
1/21/22	1/24/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120217073604	0.804	37.8100	30.40	(30.40)	-
1/21/22	1/24/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120217073539	20.601	65.2500	1,344.22	(1,344.22)	-
1/21/22	1/24/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120217073547	0.709	65.2500	46.29	(46.29)	-
1/21/22	1/24/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120217073554	18.121	45.5900	826.13	(826.13)	-
1/21/22	1/24/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120217073562	0.410	45.5900	18.68	(18.68)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
1/21/22	1/24/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120217073695	0.658	186.0800	122.52	(122.52)	-
1/21/22	1/24/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120217073703	0.077	186.0800	14.37	(14.37)	-
1/21/22	1/24/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	2.865	16.5700	47.48	(47.48)	-
1/21/22	1/24/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	3.390	22.3100	75.62	(75.62)	-
1/21/22	1/24/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	73.723	32.1200	2,367.97	(2,367.97)	-
1/21/22	1/24/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	5.636	32.1200	181.03	(181.03)	-
1/21/22	1/24/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	1.913	42.1300	80.58	(80.58)	-
1/21/22	1/24/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120217073570	13.286	48.3800	642.79	(642.79)	-
1/21/22	1/24/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120217073588	0.738	48.3800	35.69	(35.69)	-
1/21/22	1/24/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120217073612	13.890	41.2500	572.98	(572.98)	-
1/21/22	1/24/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120217073620	0.453	41.2500	18.68	(18.68)	-
						01/24/2022 Total:	(12,785.96)	
2/16/22	2/17/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120479840344	0.018	10.8900	0.20	(0.20)	-



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Investment Activity								
	Purchase of Investments							
2/16/22	2/17/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120479840377	0.003	7.4900	0.02	(0.02)	-
2/16/22	2/17/22	233203371	DFA International Core Equity Portfolio Institutional Class	0.008	15.9400	0.13	(0.13)	-
2/16/22	2/17/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	0.003	25.4100	0.07	(0.07)	-
2/16/22	2/17/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.004	45.9900	0.17	(0.17)	-
2/16/22	2/17/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	0.006	5.2700	0.03	(0.03)	-
2/16/22	2/17/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120479840286	0.001	41.9000	0.06	(0.06)	-
2/16/22	2/17/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120479840203	0.004	66.5100	0.24	(0.24)	-
2/16/22	2/17/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120479840401	0.005	186.3600	1.01	(1.01)	-
2/16/22	2/17/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120479840252	0.001	50.1600	0.03	(0.03)	-
2/16/22	2/17/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120479840310	0.001	42.6500	0.03	(0.03)	-
						02/17/2022 Total:	(1.99)	
2/23/22	2/24/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120544551991	1.992	7.9600	15.86	(15.86)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
2/23/22	2/24/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120544551983	16.840	10.8700	183.05	(183.05)	-
2/23/22	2/24/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120544552007	13.181	7.4600	98.33	(98.33)	-
2/23/22	2/24/22	233203371	DFA International Core Equity Portfolio Institutional Class	6.931	15.3200	106.18	(106.18)	-
2/23/22	2/24/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	3.317	24.7000	81.92	(81.92)	-
2/23/22	2/24/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	1.692	43.9900	74.41	(74.41)	-
2/23/22	2/24/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	2.952	5.3800	15.88	(15.88)	-
2/23/22	2/24/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120544551967	1.667	36.4900	60.83	(60.83)	-
2/23/22	2/24/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120544551934	1.508	61.4100	92.59	(92.59)	-
2/23/22	2/24/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120544551942	0.848	44.0800	37.36	(37.36)	-
2/23/22	2/24/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120544552015	0.154	186.4300	28.77	(28.77)	-
2/23/22	2/24/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	8.395	31.1500	261.50	(261.50)	-
2/23/22	2/24/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120544551959	1.484	48.1000	71.39	(71.39)	-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
2/23/22	2/24/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120544551975	0.916	40.7900	37.37	(37.37)	-
						02/24/2022 Total:	(1,165.44)	
3/4/22	3/7/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120634413029	0.989	8.0200	7.93	(7.93)	-
3/4/22	3/7/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120634413011	8.351	10.9600	91.53	(91.53)	-
3/4/22	3/7/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120634413037	6.585	7.4700	49.19	(49.19)	-
3/4/22	3/7/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.658	14.5200	53.11	(53.11)	-
3/4/22	3/7/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.717	23.8500	40.95	(40.95)	-
3/4/22	3/7/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.827	45.0300	37.22	(37.22)	-
3/4/22	3/7/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.332	5.9600	7.94	(7.94)	-
3/4/22	3/7/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120634412997	0.790	38.4600	30.39	(30.39)	-
3/4/22	3/7/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120634412963	0.746	62.0500	46.30	(46.30)	-
3/4/22	3/7/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120634412971	0.414	45.1600	18.69	(18.69)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
3/4/22	3/7/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120634413045	0.077	186.5300	14.38	(14.38)	-
3/4/22	3/7/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	9.822	31.1700	306.14	(306.14)	-
3/4/22	3/7/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120634412989	0.738	48.3400	35.67	(35.67)	-
3/4/22	3/7/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120634413003	0.449	41.6700	18.69	(18.69)	-
						03/07/2022 Total:	(758.13)	
3/8/22	3/9/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120677499257	2,390.350	7.3800	17,640.78	(17,640.78)	-
						03/09/2022 Total:	(17,640.78)	
3/18/22	3/21/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120781229186	1.009	7.8600	7.93	(7.93)	-
3/18/22	3/21/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120781229178	8.551	10.7000	91.50	(91.50)	-
3/18/22	3/21/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120781229194	6.645	7.4000	49.17	(49.17)	-
3/18/22	3/21/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.460	15.3500	53.11	(53.11)	-
3/18/22	3/21/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.700	24.1100	40.99	(40.99)	-
3/18/22	3/21/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.810	45.9600	37.21	(37.21)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
3/18/22	3/21/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.387	5.7300	7.95	(7.95)	-
3/18/22	3/21/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120781229152	0.739	41.1300	30.40	(30.40)	-
3/18/22	3/21/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120781229129	0.708	65.3900	46.29	(46.29)	-
3/18/22	3/21/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120781229137	0.394	47.4200	18.67	(18.67)	-
3/18/22	3/21/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120781229202	0.077	186.6700	14.37	(14.37)	-
3/18/22	3/21/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	8.092	31.6100	255.78	(255.78)	-
3/18/22	3/21/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120781229145	0.720	49.6000	35.71	(35.71)	-
3/18/22	3/21/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120781229160	0.438	42.6200	18.68	(18.68)	-
						03/21/2022 Total:	(707.76)	
4/5/22	4/6/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120953744665	1.021	7.7700	7.93	(7.93)	-
4/5/22	4/6/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120953744657	8.724	10.4900	91.51	(91.51)	-
4/5/22	4/6/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120953744673	6.620	7.4300	49.19	(49.19)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
4/5/22	4/6/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.477	15.2700	53.10	(53.10)	-
4/5/22	4/6/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.676	24.4400	40.97	(40.97)	-
4/5/22	4/6/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.823	45.2000	37.21	(37.21)	-
4/5/22	4/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.353	5.8700	7.94	(7.94)	-
4/5/22	4/6/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120953744632	0.744	40.8900	30.41	(30.41)	-
4/5/22	4/6/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120953744608	0.695	66.5600	46.29	(46.29)	-
4/5/22	4/6/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120953744616	0.394	47.4700	18.69	(18.69)	-
4/5/22	4/6/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120953744681	0.077	186.8800	14.37	(14.37)	-
4/5/22	4/6/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	8.107	31.5500	255.77	(255.77)	-
4/5/22	4/6/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120953744624	0.729	48.9900	35.69	(35.69)	-
4/5/22	4/6/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120953744640	0.451	41.4800	18.69	(18.69)	-
04/06/2022 Total:							(707.76)	



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
4/20/22	4/21/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121108769169	1.039	7.6300	7.93	(7.93)	-
4/20/22	4/21/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121108769151	8.894	10.2900	91.52	(91.52)	-
4/20/22	4/21/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121108769177	6.738	7.3000	49.19	(49.19)	-
4/20/22	4/21/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.503	15.1600	53.11	(53.11)	-
4/20/22	4/21/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.741	23.5500	40.99	(40.99)	-
4/20/22	4/21/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.801	46.4600	37.20	(37.20)	-
4/20/22	4/21/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.304	6.0900	7.94	(7.94)	-
4/20/22	4/21/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010121108769136	0.804	37.8000	30.41	(30.41)	-
4/20/22	4/21/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010121108769102	0.726	63.7400	46.28	(46.28)	-
4/20/22	4/21/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010121108769110	0.400	46.6800	18.68	(18.68)	-
4/20/22	4/21/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010121108769185	0.077	187.0800	14.37	(14.37)	-
4/20/22	4/21/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	8.256	30.9800	255.77	(255.77)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Purchase of Investments							
4/20/22	4/21/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010121108769128	0.705	50.6200	35.69	(35.69)	-
4/20/22	4/21/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010121108769144	0.439	42.5700	18.68	(18.68)	-
						04/21/2022 Total:	(707.76)	
5/5/22	5/6/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121251201283	1.055	7.5200	7.93	(7.93)	-
5/5/22	5/6/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121251201275	9.050	10.1100	91.50	(91.50)	-
5/5/22	5/6/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121251201291	6.925	7.1000	49.17	(49.17)	-
5/5/22	5/6/22	233203371	DFA International Core Equity Portfolio Institutional Class	3.735	14.2200	53.11	(53.11)	-
5/5/22	5/6/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	1.827	22.4400	41.00	(41.00)	-
5/5/22	5/6/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	0.844	44.0500	37.20	(37.20)	-
5/5/22	5/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	1.283	6.1900	7.94	(7.94)	-
5/5/22	5/6/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010121251201259	0.969	31.3800	30.41	(30.41)	-
5/5/22	5/6/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010121251201226	0.793	58.3400	46.29	(46.29)	-
5/5/22	5/6/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010121251201234	0.448	41.6800	18.67	(18.67)	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
Purchase of Investments								
5/5/22	5/6/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010121251201309	0.077	187.2700	14.37	(14.37)	-
5/5/22	5/6/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	8.659	29.5400	255.78	(255.78)	-
5/5/22	5/6/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010121251201242	0.749	47.6800	35.71	(35.71)	-
5/5/22	5/6/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010121251201267	0.469	39.8200	18.68	(18.68)	-
						05/06/2022 Total:	(707.76)	
5/23/22	5/24/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121440690446	0.013	6.8900	0.09	(0.09)	-
						05/24/2022 Total:	(0.09)	
5/27/22	5/31/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121474677905	13.339	7.5900	101.24	(101.24)	-
5/27/22	5/31/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121474677897	97.907	10.2600	1,004.53	(1,004.53)	-
						05/31/2022 Total:	(1,105.77)	
Total Purchase of Investments						50,858.18	(50,858.18)	-
Redemption of Investments								
1/3/22	1/4/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120035214059	(3.838)	8.2500	(31.78)	31.66	(0.12)



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Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
1/3/22	1/4/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120035214042	(20.587)	11.2800	(234.07)	232.22	(1.85)
1/3/22	1/4/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120035214067	(12.617)	7.8400	(98.92)	98.92	-
1/3/22	1/4/22	233203371	DFA International Core Equity Portfolio Institutional Class	(11.433)	16.1300	(184.07)	184.41	0.34
1/3/22	1/4/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(8.090)	25.1800	(202.58)	203.71	1.13
1/3/22	1/4/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(4.351)	46.3300	(200.41)	201.59	1.18
1/3/22	1/4/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(7.543)	4.7500	(35.68)	35.83	0.15
1/3/22	1/4/22	23320G554	DFA Global Real Estate Securities Portfolio	(3.524)	13.3800	(47.39)	47.14	(0.25)
1/3/22	1/4/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120035214026	(1.689)	48.9400	(82.88)	82.66	(0.22)
1/3/22	1/4/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120035213994	(3.344)	75.0600	(248.66)	251.00	2.34
1/3/22	1/4/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120035214000	(2.341)	53.4400	(126.06)	125.10	(0.96)
1/3/22	1/4/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120035214075	(0.488)	185.8900	(90.70)	90.71	0.01
1/3/22	1/4/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.089)	16.9000	(1.52)	1.51	(0.01)
1/3/22	1/4/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.113)	23.0300	(2.62)	2.61	(0.01)



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Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
1/3/22	1/4/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(4.265)	33.5600	(143.04)	143.12	0.08
1/3/22	1/4/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.062)	44.5300	(2.77)	2.77	-
1/3/22	1/4/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120035214018	(1.700)	50.7300	(86.02)	86.24	0.22
1/3/22	1/4/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120035214034	(3.640)	44.1500	(159.21)	160.71	1.50
						01/04/2022 Total:	1,981.91	
1/6/22	1/7/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(159.580)	33.1300	(5,351.55)	5,286.87	(64.68)
						01/07/2022 Total:	5,286.87	
1/25/22	1/26/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120259844441	(0.144)	8.1600	(1.19)	1.18	(0.01)
1/25/22	1/26/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120259844433	(0.792)	11.1300	(9.00)	8.81	(0.19)
1/25/22	1/26/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120259844458	(0.486)	7.6700	(3.81)	3.73	(0.08)
1/25/22	1/26/22	233203371	DFA International Core Equity Portfolio Institutional Class	(0.444)	15.4600	(7.14)	6.86	(0.28)
1/25/22	1/26/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.312)	24.6700	(7.82)	7.70	(0.12)
1/25/22	1/26/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(0.167)	44.7600	(7.67)	7.45	(0.22)
1/25/22	1/26/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(0.286)	5.0100	(1.35)	1.43	0.08



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Investment Activity								
	Redemption of Investments							
1/25/22	1/26/22	23320G554	DFA Global Real Estate Securities Portfolio	(0.137)	12.3700	(1.84)	1.70	(0.14)
1/25/22	1/26/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120259844417	(0.065)	37.3400	(3.19)	2.43	(0.76)
1/25/22	1/26/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120259844383	(0.130)	64.1500	(9.66)	8.34	(1.32)
1/25/22	1/26/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120259844391	(0.090)	45.0000	(4.84)	4.05	(0.79)
1/25/22	1/26/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120259844466	(0.019)	186.1200	(3.53)	3.54	0.01
1/25/22	1/26/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.004)	16.5000	(0.06)	0.06	-
1/25/22	1/26/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.005)	22.1800	(0.11)	0.10	(0.01)
1/25/22	1/26/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.165)	31.8700	(5.53)	5.26	(0.27)
1/25/22	1/26/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(136.712)	31.8700	(4,583.16)	4,357.00	(226.16)
1/25/22	1/26/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.002)	41.7300	(0.09)	0.08	(0.01)
1/25/22	1/26/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120259844409	(0.065)	48.3100	(3.29)	3.14	(0.15)
1/25/22	1/26/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120259844425	(0.139)	41.4600	(6.08)	5.76	(0.32)
01/26/2022 Total:							4,428.62	



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
2/1/22	2/2/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120324505506	(3.845)	8.1300	(31.83)	31.26	(0.57)
2/1/22	2/2/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120324505498	(20.640)	11.1000	(234.65)	229.10	(5.55)
2/1/22	2/2/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120324505514	(12.708)	7.6400	(99.61)	97.09	(2.52)
2/1/22	2/2/22	233203371	DFA International Core Equity Portfolio Institutional Class	(11.434)	15.7800	(184.08)	180.43	(3.65)
2/1/22	2/2/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(8.080)	25.0300	(202.33)	202.25	(0.08)
2/1/22	2/2/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(4.350)	45.7900	(200.37)	199.20	(1.17)
2/1/22	2/2/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(7.547)	5.1300	(35.70)	38.72	3.02
2/1/22	2/2/22	23320G554	DFA Global Real Estate Securities Portfolio	(3.530)	12.4700	(47.47)	44.02	(3.45)
2/1/22	2/2/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120324505472	(1.691)	40.5100	(82.90)	68.50	(14.40)
2/1/22	2/2/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120324505449	(3.345)	67.7300	(248.63)	226.56	(22.07)
2/1/22	2/2/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120324505456	(2.346)	47.4100	(126.24)	111.22	(15.02)
2/1/22	2/2/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120324505522	(0.487)	186.1900	(90.51)	90.67	0.16
2/1/22	2/2/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.094)	16.5600	(1.60)	1.56	(0.04)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
2/1/22	2/2/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.117)	22.4200	(2.69)	2.61	(0.08)
2/1/22	2/2/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(4.209)	32.4600	(141.10)	136.62	(4.48)
2/1/22	2/2/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.064)	42.8100	(2.83)	2.73	(0.10)
2/1/22	2/2/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120324505464	(1.703)	49.4700	(86.16)	84.25	(1.91)
2/1/22	2/2/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120324505480	(3.635)	42.0200	(158.98)	152.74	(6.24)
						02/02/2022 Total:	1,899.53	
2/16/22	2/17/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120479840351	(0.037)	10.8900	(0.42)	0.40	(0.02)
2/16/22	2/17/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120479840369	(147.399)	10.8900	(1,675.75)	1,605.18	(70.57)
2/16/22	2/17/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120479840385	(0.005)	7.4900	(0.04)	0.04	-
2/16/22	2/17/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120479840393	(18.488)	7.4900	(144.92)	138.48	(6.44)
2/16/22	2/17/22	233203371	DFA International Core Equity Portfolio Institutional Class	(0.017)	15.9400	(0.27)	0.27	-
2/16/22	2/17/22	233203371	DFA International Core Equity Portfolio Institutional Class	(78.246)	15.9400	(1,259.69)	1,247.25	(12.44)
2/16/22	2/17/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.006)	25.4100	(0.14)	0.14	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
2/16/22	2/17/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(21.161)	25.4100	(529.88)	537.71	7.83
2/16/22	2/17/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(0.007)	45.9900	(0.33)	0.33	-
2/16/22	2/17/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(28.867)	45.9900	(1,329.54)	1,327.57	(1.97)
2/16/22	2/17/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(0.011)	5.2700	(0.05)	0.06	0.01
2/16/22	2/17/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(21.534)	5.2700	(101.87)	113.48	11.61
2/16/22	2/17/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120479840294	(0.003)	41.9000	(0.15)	0.13	(0.02)
2/16/22	2/17/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120479840302	(11.722)	41.9000	(574.67)	491.15	(83.52)
2/16/22	2/17/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120479840211	(0.007)	66.5100	(0.52)	0.47	(0.05)
2/16/22	2/17/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120479840229	(28.474)	66.5100	(2,116.45)	1,893.81	(222.64)
2/16/22	2/17/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120479840237	(0.001)	47.8400	(0.05)	0.05	-
2/16/22	2/17/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120479840245	(7.243)	47.8400	(389.76)	346.51	(43.25)
2/16/22	2/17/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.001)	32.1300	(0.03)	0.03	-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
2/16/22	2/17/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(4.518)	32.1300	(151.47)	145.17	(6.30)
2/16/22	2/17/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120479840260	(0.001)	50.1600	(0.05)	0.05	-
2/16/22	2/17/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120479840278	(5.725)	50.1600	(289.64)	287.17	(2.47)
2/16/22	2/17/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120479840328	(0.001)	42.6500	(0.04)	0.04	-
2/16/22	2/17/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120479840336	(6.502)	42.6500	(284.37)	277.31	(7.06)
						02/17/2022 Total:	8,412.80	
2/24/22	2/25/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120555560576	(21.909)	7.9500	(181.39)	174.18	(7.21)
2/24/22	2/25/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120555560568	(142.633)	10.8500	(1,621.41)	1,547.57	(73.84)
2/24/22	2/25/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120555560584	(93.045)	7.4400	(729.32)	692.25	(37.07)
2/24/22	2/25/22	233203371	DFA International Core Equity Portfolio Institutional Class	(70.511)	15.0900	(1,135.15)	1,064.01	(71.14)
2/24/22	2/25/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(27.803)	24.2000	(696.18)	672.84	(23.34)
2/24/22	2/25/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(22.353)	44.0000	(1,029.52)	983.52	(46.00)
2/24/22	2/25/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(33.693)	5.4100	(159.40)	182.28	22.88
2/24/22	2/25/22	23320G554	DFA Global Real Estate Securities Portfolio	(26.812)	12.0100	(360.51)	322.01	(38.50)



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
2/24/22	2/25/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120555560543	(11.100)	39.1000	(544.12)	434.01	(110.11)
2/24/22	2/25/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120555560519	(21.320)	63.0500	(1,584.65)	1,344.23	(240.42)
2/24/22	2/25/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120555560527	(18.014)	45.8600	(969.34)	826.12	(143.22)
2/24/22	2/25/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120555560592	(0.657)	186.4400	(122.11)	122.49	0.38
2/24/22	2/25/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(2.942)	16.1400	(49.87)	47.48	(2.39)
2/24/22	2/25/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(3.483)	21.7100	(80.31)	75.62	(4.69)
2/24/22	2/25/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(42.483)	31.2200	(1,424.12)	1,326.31	(97.81)
2/24/22	2/25/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(1.970)	40.9100	(87.44)	80.58	(6.86)
2/24/22	2/25/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120555560535	(13.333)	48.2100	(674.54)	642.78	(31.76)
2/24/22	2/25/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120555560550	(13.975)	41.0000	(611.21)	572.98	(38.23)
						02/25/2022 Total:	11,111.26	
2/25/22	2/28/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(32.416)	31.6400	(1,086.66)	1,025.64	(61.02)
						02/28/2022 Total:	1,025.64	



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Investment Activity								
	Redemption of Investments							
2/28/22	3/1/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120597791577	(0.147)	7.9900	(1.22)	1.17	(0.05)
2/28/22	3/1/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120597791569	(0.792)	10.9400	(9.00)	8.66	(0.34)
2/28/22	3/1/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120597791585	(0.487)	7.5100	(3.82)	3.66	(0.16)
2/28/22	3/1/22	233203371	DFA International Core Equity Portfolio Institutional Class	(0.441)	15.3200	(7.09)	6.75	(0.34)
2/28/22	3/1/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.313)	24.4200	(7.83)	7.63	(0.20)
2/28/22	3/1/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(0.166)	45.0500	(7.65)	7.48	(0.17)
2/28/22	3/1/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(0.288)	5.3800	(1.36)	1.55	0.19
2/28/22	3/1/22	23320G554	DFA Global Real Estate Securities Portfolio	(0.135)	12.1400	(1.82)	1.64	(0.18)
2/28/22	3/1/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120597791544	(0.064)	40.7500	(3.14)	2.61	(0.53)
2/28/22	3/1/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120597791510	(0.129)	64.5200	(9.59)	8.32	(1.27)
2/28/22	3/1/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120597791528	(0.090)	47.0200	(4.84)	4.23	(0.61)
2/28/22	3/1/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120597791593	(0.020)	186.4800	(3.72)	3.73	0.01
2/28/22	3/1/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.004)	16.3000	(0.06)	0.06	-



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
2/28/22	3/1/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.004)	21.9600	(0.10)	0.09	(0.01)
2/28/22	3/1/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.161)	31.6400	(5.40)	5.10	(0.30)
2/28/22	3/1/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.002)	41.5300	(0.09)	0.08	(0.01)
2/28/22	3/1/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120597791536	(0.065)	49.1100	(3.29)	3.19	(0.10)
2/28/22	3/1/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120597791551	(0.140)	42.1400	(6.12)	5.90	(0.22)
						03/01/2022 Total:	71.85	
3/1/22	3/2/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120609054121	(3.903)	8.0500	(32.31)	31.42	(0.89)
3/1/22	3/2/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120609054097	(20.879)	11.0100	(237.35)	229.88	(7.47)
3/1/22	3/2/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120609054154	(12.924)	7.5100	(101.29)	97.06	(4.23)
3/1/22	3/2/22	233203371	DFA International Core Equity Portfolio Institutional Class	(11.558)	15.0000	(186.06)	173.36	(12.70)
3/1/22	3/2/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(8.190)	24.2700	(205.07)	198.76	(6.31)
3/1/22	3/2/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(4.398)	44.2200	(202.56)	194.48	(8.08)
3/1/22	3/2/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(7.642)	5.6100	(36.15)	42.87	6.72
3/1/22	3/2/22	23320G554	DFA Global Real Estate Securities Portfolio	(3.571)	12.0600	(48.02)	43.07	(4.95)



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
3/1/22	3/2/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120609053966	(1.708)	40.1500	(83.73)	68.58	(15.15)
3/1/22	3/2/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120609053909	(3.379)	63.3900	(251.15)	214.19	(36.96)
3/1/22	3/2/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120609053941	(2.374)	46.3100	(127.75)	109.94	(17.81)
3/1/22	3/2/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120609054444	(0.495)	186.4900	(92.00)	92.31	0.31
3/1/22	3/2/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.094)	16.3400	(1.59)	1.53	(0.06)
3/1/22	3/2/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.117)	21.9100	(2.70)	2.56	(0.14)
3/1/22	3/2/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(4.247)	31.4300	(142.38)	133.49	(8.89)
3/1/22	3/2/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.065)	41.0500	(2.86)	2.65	(0.21)
3/1/22	3/2/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120609053958	(1.722)	48.0500	(87.12)	82.74	(4.38)
3/1/22	3/2/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120609054022	(3.685)	41.1600	(161.17)	151.67	(9.50)
						03/02/2022 Total:	1,870.56	
3/8/22	3/9/22	23320G554	DFA Global Real Estate Securities Portfolio	(213.185)	12.0300	(2,866.45)	2,564.62	(301.83)
3/8/22	3/9/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120677499224	(93.271)	59.6000	(6,932.44)	5,558.95	(1,373.49)



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
3/8/22	3/9/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120677499232	(124.459)	43.3000	(6,697.13)	5,389.07	(1,308.06)
3/8/22	3/9/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.001)	30.4300	(0.04)	0.03	(0.01)
3/8/22	3/9/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120677499240	(88.303)	46.7500	(4,467.36)	4,128.17	(339.19)
						03/09/2022 Total:	17,640.84	
3/21/22	3/22/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120802103436	(0.149)	7.8100	(1.23)	1.16	(0.07)
3/21/22	3/22/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120802103428	(0.791)	10.6100	(8.99)	8.39	(0.60)
3/21/22	3/22/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120802103444	(0.530)	7.3800	(4.14)	3.91	(0.23)
3/21/22	3/22/22	233203371	DFA International Core Equity Portfolio Institutional Class	(0.439)	15.3100	(7.06)	6.72	(0.34)
3/21/22	3/22/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.311)	23.8000	(7.79)	7.40	(0.39)
3/21/22	3/22/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(0.168)	46.1000	(7.72)	7.73	0.01
3/21/22	3/22/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(0.292)	5.8200	(1.38)	1.70	0.32
3/21/22	3/22/22	23320G554	DFA Global Real Estate Securities Portfolio	(0.132)	12.4800	(1.77)	1.65	(0.12)
3/21/22	3/22/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120802103402	(0.065)	40.1900	(3.19)	2.61	(0.58)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
3/21/22	3/22/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120802103378	(0.127)	64.9900	(9.44)	8.25	(1.19)
3/21/22	3/22/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120802103386	(0.088)	46.9300	(4.74)	4.13	(0.61)
3/21/22	3/22/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120802103451	(0.020)	186.7100	(3.72)	3.73	0.01
3/21/22	3/22/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.004)	15.9700	(0.06)	0.06	-
3/21/22	3/22/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.004)	21.6700	(0.10)	0.09	(0.01)
3/21/22	3/22/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.162)	31.4300	(5.42)	5.09	(0.33)
3/21/22	3/22/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.002)	41.5100	(0.10)	0.10	-
3/21/22	3/22/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120802103394	(0.064)	49.5200	(3.24)	3.17	(0.07)
3/21/22	3/22/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120802103410	(0.140)	42.5100	(6.12)	5.95	(0.17)
						03/22/2022 Total:	71.84	
4/1/22	4/4/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010120911414948	(3.849)	7.8000	(31.86)	30.02	(1.84)
4/1/22	4/4/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010120911414930	(20.609)	10.5800	(234.24)	218.04	(16.20)
4/1/22	4/4/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010120911414955	(13.778)	7.4400	(107.50)	102.51	(4.99)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
4/1/22	4/4/22	233203371	DFA International Core Equity Portfolio Institutional Class	(11.385)	15.4000	(183.27)	175.32	(7.95)
4/1/22	4/4/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(8.067)	24.3800	(201.98)	196.66	(5.32)
4/1/22	4/4/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(4.333)	45.7600	(199.55)	198.26	(1.29)
4/1/22	4/4/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(7.523)	5.7700	(35.59)	43.41	7.82
4/1/22	4/4/22	23320G554	DFA Global Real Estate Securities Portfolio	(3.429)	13.0500	(46.11)	44.75	(1.36)
4/1/22	4/4/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010120911414914	(1.684)	41.6100	(82.54)	70.07	(12.47)
4/1/22	4/4/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010120911414880	(3.289)	66.8300	(244.45)	219.80	(24.65)
4/1/22	4/4/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010120911414898	(2.286)	47.8300	(123.01)	109.34	(13.67)
4/1/22	4/4/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010120911414963	(0.487)	186.8300	(90.51)	90.99	0.48
4/1/22	4/4/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.093)	15.9600	(1.58)	1.49	(0.09)
4/1/22	4/4/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.115)	21.7400	(2.66)	2.51	(0.15)
4/1/22	4/4/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(4.189)	31.7500	(140.41)	133.00	(7.41)
4/1/22	4/4/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.063)	42.0900	(2.81)	2.67	(0.14)



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
4/1/22	4/4/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010120911414906	(1.660)	49.7800	(83.98)	82.63	(1.35)
4/1/22	4/4/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010120911414922	(3.630)	42.2500	(158.76)	153.37	(5.39)
						04/04/2022 Total:	1,874.84	
4/21/22	4/22/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121111020121	(0.150)	7.6000	(1.24)	1.14	(0.10)
4/21/22	4/22/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121111020113	(0.813)	10.2400	(9.24)	8.33	(0.91)
4/21/22	4/22/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121111020139	(0.547)	7.2700	(4.27)	3.98	(0.29)
4/21/22	4/22/22	233203371	DFA International Core Equity Portfolio Institutional Class	(0.451)	15.0000	(7.25)	6.76	(0.49)
4/21/22	4/22/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.317)	23.1900	(7.95)	7.36	(0.59)
4/21/22	4/22/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(0.171)	45.8200	(7.86)	7.82	(0.04)
4/21/22	4/22/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(0.294)	6.0900	(1.39)	1.79	0.40
4/21/22	4/22/22	23320G554	DFA Global Real Estate Securities Portfolio	(0.134)	13.0300	(1.80)	1.74	(0.06)
4/21/22	4/22/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010121111020097	(0.067)	36.0700	(3.28)	2.42	(0.86)
4/21/22	4/22/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010121111020063	(0.130)	62.5000	(9.66)	8.13	(1.53)



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Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
4/21/22	4/22/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010121111020071	(0.090)	45.1400	(4.84)	4.06	(0.78)
4/21/22	4/22/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010121111020147	(0.020)	187.0900	(3.72)	3.74	0.02
4/21/22	4/22/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.004)	15.4600	(0.06)	0.06	-
4/21/22	4/22/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.005)	21.0200	(0.11)	0.10	(0.01)
4/21/22	4/22/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.166)	30.6500	(5.57)	5.09	(0.48)
4/21/22	4/22/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.002)	40.5700	(0.10)	0.09	(0.01)
4/21/22	4/22/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010121111020089	(0.065)	49.9600	(3.29)	3.25	(0.04)
4/21/22	4/22/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010121111020105	(0.143)	42.1000	(6.25)	6.02	(0.23)
						04/22/2022 Total:	71.88	
5/2/22	5/3/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121227535566	(3.866)	7.5500	(32.00)	29.19	(2.81)
5/2/22	5/3/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121227535558	(20.722)	10.1200	(235.48)	209.71	(25.77)
5/2/22	5/3/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121227535574	(13.892)	7.1100	(108.35)	98.77	(9.58)
5/2/22	5/3/22	233203371	DFA International Core Equity Portfolio Institutional Class	(11.444)	14.2900	(184.22)	163.54	(20.68)



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Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
5/2/22	5/3/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(8.103)	22.6900	(202.90)	183.87	(19.03)
5/2/22	5/3/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(4.367)	43.2900	(201.16)	189.06	(12.10)
5/2/22	5/3/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(7.556)	6.0300	(35.75)	45.56	9.81
5/2/22	5/3/22	23320G554	DFA Global Real Estate Securities Portfolio	(3.441)	12.0000	(46.26)	41.29	(4.97)
5/2/22	5/3/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010121227535533	(1.689)	34.2900	(82.78)	57.92	(24.86)
5/2/22	5/3/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010121227535509	(3.301)	59.2400	(245.34)	195.55	(49.79)
5/2/22	5/3/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010121227535517	(2.294)	42.7700	(123.44)	98.11	(25.33)
5/2/22	5/3/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010121227535582	(0.489)	187.2300	(90.89)	91.56	0.67
5/2/22	5/3/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.093)	15.2200	(1.58)	1.42	(0.16)
5/2/22	5/3/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.114)	20.5300	(2.64)	2.35	(0.29)
5/2/22	5/3/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(4.209)	29.6800	(141.07)	124.93	(16.14)
5/2/22	5/3/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.063)	38.9800	(2.81)	2.46	(0.35)
5/2/22	5/3/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010121227535525	(1.666)	47.2200	(84.28)	78.67	(5.61)



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Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Redemption of Investments							
5/2/22	5/3/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010121227535541	(3.642)	39.6900	(159.29)	144.55	(14.74)
						05/03/2022 Total:	1,758.51	
5/23/22	5/24/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121440690438	(0.161)	7.5300	(1.33)	1.21	(0.12)
5/23/22	5/24/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121440690420	(0.860)	10.1600	(9.77)	8.74	(1.03)
5/23/22	5/24/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121440690453	(0.027)	6.8900	(0.21)	0.19	(0.02)
5/23/22	5/24/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121440690461	(3,166.881)	6.8900	(24,698.93)	21,819.81	(2,879.12)
5/23/22	5/24/22	233203371	DFA International Core Equity Portfolio Institutional Class	(0.481)	14.4100	(7.74)	6.93	(0.81)
5/23/22	5/24/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.338)	22.3000	(8.47)	7.54	(0.93)
5/23/22	5/24/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(0.182)	43.3100	(8.37)	7.87	(0.50)
5/23/22	5/24/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(0.316)	6.1500	(1.49)	1.94	0.45
5/23/22	5/24/22	23320G554	DFA Global Real Estate Securities Portfolio	(0.144)	11.5000	(1.94)	1.66	(0.28)
5/23/22	5/24/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010121440690404	(0.071)	28.2900	(3.48)	2.01	(1.47)
5/23/22	5/24/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010121440690370	(0.139)	54.8700	(10.33)	7.63	(2.70)



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Investment Activity								
	Redemption of Investments							
5/23/22	5/24/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010121440690388	(0.096)	39.3300	(5.17)	3.78	(1.39)
5/23/22	5/24/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 Settlement Control No:010121440690487	(0.021)	187.5100	(3.90)	3.94	0.04
5/23/22	5/24/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(0.004)	15.1700	(0.07)	0.06	(0.01)
5/23/22	5/24/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(0.005)	20.3300	(0.10)	0.09	(0.01)
5/23/22	5/24/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(0.177)	29.2000	(5.91)	5.15	(0.76)
5/23/22	5/24/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(0.003)	38.0900	(0.11)	0.10	(0.01)
5/23/22	5/24/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010121440690396	(0.069)	46.8800	(3.49)	3.23	(0.26)
5/23/22	5/24/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010121440690412	(0.153)	38.9900	(6.69)	5.97	(0.72)
						05/24/2022 Total:	21,887.85	
5/24/22	5/25/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121441657899	(9,220.436)	7.5600	(76,316.92)	69,706.50	(6,610.42)
5/24/22	5/25/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121441657881	(49,313.701)	10.2100	(560,262.19)	503,492.89	(56,769.30)
5/24/22	5/25/22	09260B614	BlackRock High Yield Bond Portfolio Class K Settlement Control No:010121441657907	(30,030.619)	6.9000	(234,212.82)	207,211.27	(27,001.55)
5/24/22	5/25/22	233203371	DFA International Core Equity Portfolio Institutional Class	(27,232.586)	14.3500	(438,369.68)	390,787.61	(47,582.07)



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Investment Activity								
	Redemption of Investments							
5/24/22	5/25/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(19,283.612)	21.9400	(482,829.93)	423,082.45	(59,747.48)
5/24/22	5/25/22	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class	(10,389.743)	43.2200	(478,546.91)	449,044.69	(29,502.22)
5/24/22	5/25/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares	(17,972.432)	6.2100	(85,032.50)	111,608.80	26,576.30
5/24/22	5/25/22	23320G554	DFA Global Real Estate Securities Portfolio	(8,184.110)	11.5700	(110,042.07)	94,690.16	(15,351.91)
5/24/22	5/25/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010121441657865	(4,022.107)	26.6200	(197,116.01)	107,068.49	(90,047.52)
5/24/22	5/25/22	399874817	American Funds The Growth Fund of America Class R-6 Settlement Control No:010121441657832	(7,854.250)	53.6300	(583,741.31)	421,223.43	(162,517.88)
5/24/22	5/25/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010121441657840	(5,458.345)	38.2700	(293,699.86)	208,890.86	(84,809.00)
5/24/22	5/25/22	921909206	Vanguard LifeStrategy Income Fund Investor Shares	(221.383)	15.2100	(3,752.03)	3,367.23	(384.80)
5/24/22	5/25/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares	(275.218)	20.3200	(6,344.20)	5,592.43	(751.77)
5/24/22	5/25/22	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares	(10,025.269)	29.0900	(335,960.57)	291,635.09	(44,325.48)
5/24/22	5/25/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares	(150.669)	37.8400	(6,688.41)	5,701.30	(987.11)
5/24/22	5/25/22	94987W513	Allspring Special Mid Cap Value Fund - Class R6 Settlement Control No:010121441657857	(3,965.416)	46.5900	(200,611.30)	184,748.73	(15,862.57)
5/24/22	5/25/22	94988A668	Allspring Special Small Cap Value Fund - Class R6 Settlement Control No:010121441657873	(8,665.153)	38.7300	(378,974.21)	335,601.38	(43,372.83)
						05/25/2022 Total:	3,813,453.31	



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Investment Activity								
	Redemption of Investments							
6/14/22	6/15/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010121651141436	(13.338)	7.2700	(101.23)	96.97	(4.26)
6/14/22	6/15/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010121651141428	(97.906)	9.8000	(1,004.52)	959.48	(45.04)
						06/15/2022 Total:	1,056.45	
9/14/22	9/15/22	01853W808	AB Global Bond Fund Class Z Settlement Control No:010122578751034	(0.017)	7.3000	(0.13)	0.12	(0.01)
9/14/22	9/15/22	024071862	American Funds American Balanced Fund Class R-2 Settlement Control No:010122578751042	(0.001)	28.4500	(0.03)	0.03	-
9/14/22	9/15/22	057071854	Baird Aggregate Bond Fund Class Institutional Settlement Control No:010122578751059	(0.001)	9.8000	(0.01)	0.01	-
9/14/22	9/15/22	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class	(0.001)	20.7100	(0.01)	0.01	-
9/14/22	9/15/22	24610A505	Delaware Smid Cap Growth Fund Class R6 Settlement Control No:010122578751067	(0.001)	30.4200	(0.05)	0.03	(0.02)
9/14/22	9/15/22	298706862	American Funds EuroPacific Growth Fund Class R-2 Settlement Control No:010122578751075	(0.001)	45.5100	(0.06)	0.05	(0.01)
9/14/22	9/15/22	4812C2288	JPMorgan Mid Cap Growth Fund Class R6 Settlement Control No:010122578751083	(0.001)	41.0800	(0.05)	0.04	(0.01)
						09/15/2022 Total:	0.29	
Total Redemption of Investments						(4,561,494.79)	3,893,904.85	(667,589.94)
Short Term Gain Distributions								



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Investment Activity								
	Short Term Gain Distributions							
12/7/22	56064L272	MainStay CBRE Real Estate Fund Class A (Rate: 0.463640000 per share)		0.008	7.8800	0.06	-	0.06
Total	Short Term Gain Distributions					0.06	-	0.06
Long Term Gain Distributions								
12/7/22	56064L272	MainStay CBRE Real Estate Fund Class A (Rate: 2.389850000 per share)		0.037	7.8800	0.29	-	0.29
Total	Long Term Gain Distributions					0.29	-	0.29
Securities Transferred In								
4/20/22	6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Corrective Trade due to DFA NAV error Updated to tranin/out cash settled in sweep	1.291	6.1500	7.94	-	7.94
4/21/22	6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Reversal due to revised NAV by DFA Updated to tran in/out cash settled in sweep	0.294	6.0900	1.79	-	1.79
5/23/22	6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Reversal due to revised NAV by DFA Updated to tran in/out cash settled in sweep	0.316	6.1500	1.94	-	1.94
	6/7/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Clearing residual	0.013	6.4000	0.08	-	0.08
Total	Securities Transferred In					11.75	-	11.75



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date			Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity								
	Securities Transferred Out							
	5/27/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 liquidation Included \$1,966.14 of Appreciation	(1,164.054)	187.5500	(218,318.33)	-	(218,318.33)
4/20/22	6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Reversal due to revised NAV by DFA Updated to tran in/out cash settled in sweep Included -\$7.93 of Appreciation	(1.304)	6.0900	(7.94)	-	(7.94)
4/21/22	6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Corrective Trade due to DFA NAV error Updated to tranin/out cash settled in sweep Included \$0.01 of Appreciation	(0.294)	6.1600	(1.81)	-	(1.81)
5/23/22	6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Corrective Trade due to DFA NAV error Updated to tranin/out cash settled in sweep Included \$0.02 of Appreciation	(0.316)	6.2100	(1.96)	-	(1.96)
	9/14/22	233203371	DFA International Core Equity Portfolio Institutional Class Write Off Residual	-	-	-	-	-
	9/14/22	23320G554	DFA Global Real Estate Securities Portfolio Write Off Residual	-	-	-	-	-
	9/14/22	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares Write Off Residual	-	-	-	-	-



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
Securities Transferred Out							
9/14/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares Write Off Residual Included -\$0.01 of Appreciation	-	-	-	-	-
Total	Securities Transferred Out				(218,330.04)	-	(218,330.04)
Transferred Appreciation / Depreciation							
5/27/22	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0 liquidation	-	-	1,966.14	-	1,966.14
6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Reversal due to revised NAV by DFA Updated to tran in/out cash settled in sweep	-	-	(7.93)	-	(7.93)
6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Corrective Trade due to DFA NAV error Updated to tranin/out cash settled in sweep	-	-	0.01	-	0.01
6/6/22	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares Corrective Trade due to DFA NAV error Updated to tranin/out cash settled in sweep	-	-	0.02	-	0.02
9/14/22	921909503	Vanguard LifeStrategy Growth Fund Investor Shares Write Off Residual	-	-	(0.01)	-	(0.01)
Total	Transferred Appreciation / Depreciation				1,958.23	-	1,958.23
Unrealized Appreciation / Depreciation							



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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
Unrealized Appreciation / Depreciation							
	01853W808	AB Global Bond Fund Class Z					-
		Beginning Value:		75,862.39			
		Plus Purchased Inventory:		903.27			
		Less Sold Inventory:		-76,765.66			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	024071862	American Funds American Balanced Fund Class R-2					-
		Beginning Value:		0.03			
		Plus Purchased Inventory:		0.00			
		Less Sold Inventory:		-0.03			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	057071854	Baird Aggregate Bond Fund Class Institutional					-
		Beginning Value:		557,851.63			
		Plus Purchased Inventory:		9,052.25			
		Less Sold Inventory:		-566,903.88			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	09260B614	BlackRock High Yield Bond Portfolio Class K					-
		Beginning Value:		236,875.96			
		Plus Purchased Inventory:		23,441.99			
		Less Sold Inventory:		-260,317.95			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			



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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
		Unrealized Appreciation / Depreciation					
	233203371	DFA International Core Equity Portfolio Institutional Class					-
		Beginning Value:		438,760.07			
		Plus Purchased Inventory:		2,962.70			
		Less Sold Inventory:		-441,722.77			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	233203421	DFA Emerging Markets Core Equity Portfolio Institutional Class					-
		Beginning Value:		482,845.95			
		Plus Purchased Inventory:		2,264.91			
		Less Sold Inventory:		-485,110.86			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	233203827	DFA U.S. Large Cap Value Portfolio Institutional Class					-
		Beginning Value:		477,657.60			
		Plus Purchased Inventory:		4,292.02			
		Less Sold Inventory:		-481,949.62			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	23320G463	DFA Commodity Strategy Portfolio Institutional Class Shares					7.86
		Beginning Value:		85,097.17			
		Plus Purchased Inventory:		394.24			
		Less Sold Inventory:		-85,499.27			
		Ending Inventory Value:		-7.86			
		Ending Market Value:		0.00			



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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
		Unrealized Appreciation / Depreciation					
	23320G554	DFA Global Real Estate Securities Portfolio					-
		Beginning Value:		112,898.01			
		Plus Purchased Inventory:		615.44			
		Less Sold Inventory:		-113,513.45			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	24610A505	Delaware Smid Cap Growth Fund Class R6					-
		Beginning Value:		197,519.95			
		Plus Purchased Inventory:		1,146.16			
		Less Sold Inventory:		-198,666.11			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	298706862	American Funds EuroPacific Growth Fund Class R-2					-
		Beginning Value:		0.06			
		Plus Purchased Inventory:		0.00			
		Less Sold Inventory:		-0.06			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	399874817	American Funds The Growth Fund of America Class R-6					-
		Beginning Value:		592,470.74			
		Plus Purchased Inventory:		3,191.54			
		Less Sold Inventory:		-595,662.28			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
		Unrealized Appreciation / Depreciation					
	4812C2288	JPMorgan Mid Cap Growth Fund Class R6					-
		Beginning Value:		300,442.13			
		Plus Purchased Inventory:		1,964.99			
		Less Sold Inventory:		-302,407.12			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	56064L272	MainStay CBRE Real Estate Fund Class A					(0.88)
		Beginning Value:		1.77			
		Plus Purchased Inventory:		0.41			
		Less Sold Inventory:		0.00			
		Ending Inventory Value:		2.18			
		Ending Market Value:		1.30			
	759522204	Reliance Trust Stable Value Fd - MetLife Series 25053 Class 0					-
		Beginning Value:		216,135.29			
		Plus Purchased Inventory:		812.21			
		Less Sold Inventory:		-216,947.50			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	921909206	Vanguard LifeStrategy Income Fund Investor Shares					-
		Beginning Value:		3,666.92			
		Plus Purchased Inventory:		143.16			
		Less Sold Inventory:		-3,810.08			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			



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For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
		Unrealized Appreciation / Depreciation					
	921909305	Vanguard LifeStrategy Conservative Growth Fund Investor Shares					-
		Beginning Value:		6,206.80			
		Plus Purchased Inventory:		231.54			
		Less Sold Inventory:		-6,438.34			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	921909404	Vanguard LifeStrategy Moderate Growth Fund Investor Shares					-
		Beginning Value:		340,850.24			
		Plus Purchased Inventory:		8,443.19			
		Less Sold Inventory:		-349,293.43			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	921909503	Vanguard LifeStrategy Growth Fund Investor Shares					-
		Beginning Value:		6,591.67			
		Plus Purchased Inventory:		198.76			
		Less Sold Inventory:		-6,790.43			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			
	94987W513	Allspring Special Mid Cap Value Fund - Class R6					-
		Beginning Value:		205,009.19			
		Plus Purchased Inventory:		1,477.86			
		Less Sold Inventory:		-206,487.05			
		Ending Inventory Value:		0.00			
		Ending Market Value:		0.00			



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Transaction Listing

Trade Date	Posting Date		Shares	Price	Inventory Cost	Cash	Market to Market Effect
Investment Activity							
		Unrealized Appreciation / Depreciation					
		94988A668	Allspring Special Small Cap Value Fund - Class R6				
			Beginning Value:				
			379,500.31				
			Plus Purchased Inventory:				
			1,198.19				
			Less Sold Inventory:				
			-380,698.50				
			Ending Inventory Value:				
			0.00				
			Ending Market Value:				
			0.00				
		Total	Unrealized Appreciation / Depreciation				
							6.98
Total Investment Activity					(4,726,996.32)	3,843,046.67	(883,942.67)
Total For Account					(4,716,249.56)	(0.40)	(4,716,242.98)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

5% Reportable Transactions

Plan Value: 4,716,244.28

Trade Date	Posting Date	Shares	Price	Inventory Cost	Cash Value	% of Plan Value	Mkt to Mkt Gain (Loss)
057071854 - Baird Aggregate Bond Fund Class Institutional							
Total Purchase of Investments					4,651.02	12 Items	
5/24/22	5/25/22	(49,313.701)	10.2100	(560,262.19)	503,492.89	11 %	(56,769.30)
Total Redemption of Investments					508,767.41	16 Items	
Total 057071854 - Baird Aggregate Bond Fund Class Institutional					513,418.43	11 %	(57018.68)
09260B614 - BlackRock High Yield Bond Portfolio Class K							
Total Purchase of Investments					19,604.34	13 Items	
Total Redemption of Investments					230,371.67	15 Items	
Total 09260B614 - BlackRock High Yield Bond Portfolio Class K					249,976.01	5 %	(29946.28)
233203371 - DFA International Core Equity Portfolio Institutional Class							
Total Purchase of Investments					2,335.89	11 Items	
5/24/22	5/25/22	(27,232.586)	14.3500	(438,369.68)	390,787.61	8 %	(47,582.07)
Total Redemption of Investments					394,010.22	14 Items	
Total 233203371 - DFA International Core Equity Portfolio Institutional Class					396,346.11	8 %	(47712.55)
233203421 - DFA Emerging Markets Core Equity Portfolio Institutional Class							
Total Purchase of Investments					1,773.78	11 Items	



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

5% Reportable Transactions

Plan Value: 4,716,244.28

Trade Date	Posting Date	Shares	Price	Inventory Cost	Cash Value	% of Plan Value	Mkt to Mkt Gain (Loss)
233203421 - DFA Emerging Markets Core Equity Portfolio Institutional Class							
5/24/22	5/25/22	(19,283.612)	21.9400	(482,829.93)	423,082.45	9 %	(59,747.48)
Total Redemption of Investments					425,316.03	15 Items	
Total 233203421 - DFA Emerging Markets Core Equity Portfolio Institutional Class					427,089.81	9 %	(59794.83)
233203827 - DFA U.S. Large Cap Value Portfolio Institutional Class							
Total Purchase of Investments					2,215.26	11 Items	
5/24/22	5/25/22	(10,389.743)	43.2200	(478,546.91)	449,044.69	10 %	(29,502.22)
Total Redemption of Investments					452,377.05	14 Items	
Total 233203827 - DFA U.S. Large Cap Value Portfolio Institutional Class					454,592.31	10 %	(29572.57)
399874817 - American Funds The Growth Fund of America Class R-6							
Total Purchase of Investments					3,191.54	11 Items	
5/24/22	5/25/22	(7,854.250)	53.6300	(583,741.31)	421,223.43	9 %	(162,517.88)
Total Redemption of Investments					431,168.66	15 Items	
Total 399874817 - American Funds The Growth Fund of America Class R-6					434,360.20	9 %	(164493.62)
921909404 - Vanguard LifeStrategy Moderate Growth Fund Investor Shares							
Total Purchase of Investments					8,443.19	10 Items	



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

5% Reportable Transactions

Plan Value: 4,716,244.28

Trade Date	Posting Date	Shares	Price	Inventory Cost	Cash Value	% of Plan Value	Mkt to Mkt Gain (Loss)
921909404 - Vanguard LifeStrategy Moderate Growth Fund Investor Shares							
5/24/22	5/25/22	(10,025.269)	29.0900	(335,960.57)	291,635.09	6 %	(44,325.48)
Total Redemption of Investments					304,472.99	18 Items	
Total 921909404 - Vanguard LifeStrategy Moderate Growth Fund Investor Shares					312,916.18	7 %	(44820.44)
94988A668 - Allspring Special Small Cap Value Fund - Class R6							
Total Purchase of Investments					1,198.19	11 Items	
5/24/22	5/25/22	(8,665.153)	38.7300	(378,974.21)	335,601.38	7 %	(43,372.83)
Total Redemption of Investments					337,244.35	14 Items	
Total 94988A668 - Allspring Special Small Cap Value Fund - Class R6					338,442.54	7 %	(43454.15)



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

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Rebates From Investments

			Dealer Concessions	12b1 Fees	Sub-TA/SSF Fees	Total Rebate
Security						
354713547	FSMRX	Franklin Small-Mid Cap Growth Fund Class R	0.00	0.00	0.00	0.00
56064L272	CLARX	MainStay CBRE Real Estate Fund Class A	0.00	0.00	0.00	0.00
Total For Account			0.00	0.00	0.00	0.00



Rev. 11/1/2021

FACTS

WHAT DOES the EdgeCo Group of Companies and Associates 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 name/address
- financial information and investment objectives
- suitability information and investment experience

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 customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons EdgeCo chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does EdgeCo share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - information about your creditworthiness	No	N/A
For nonaffiliates to market to you	No	N/A

Questions?

Call 800-693-7800 or go to www.macg.com



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022



CITADEL RISK MANAGEMENT INC 401(k) Profit Sharing Plan & Trust

For the Period 01/01/2022 through 12/31/2022

Who we are	
Who is providing this notice?	NewEdge Securities, Inc, NewEdge Advisors, LLC, Mid Atlantic Trust Company, American Trust Company, AT Retirement Services, LLC, AT Insurance, LLC, LPA Insurance Agency, Inc., and NewEdge Wealth LLC (for additional Companies see below).
What we do	
How does EdgeCo protect my personal information?	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.
How does EdgeCo collect my personal information?	We collect your personal information, for example, when you · open an account or transfer an account · update your account or transact in your account · or from your representative regarding your preferences
Why can't I limit all sharing?	Federal law gives you the right to limit only · sharing for affiliates' everyday business purposes - information about your creditworthiness · affiliates from using your information to market to you · sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. · EdgeCo Buyer, Inc.; GUA/Uniontown Capital Corp.; Mid Atlantic Capital Group, Inc.; Mid Atlantic Clearing & Settlement Corporation; NewEdge Capital Group, LLC and New Edge Wealth Holdings L.P..
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. · Our nonaffiliated service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by EdgeCo **
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. · Mid Atlantic does not share personal information with unaffiliated third parties for use in marketing their products or services.
Other important information	
** If you conduct business with EdgeCo through a nonaffiliated investment professional, we may exchange information that we collect with your investment professional or with others they may authorize.	



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