

SDBA Model Overview Disclosures

SDBA strategy typically seeks to participate in all markets and sectors by investing the portfolio in sectors which HCM's Proactive Section Rotation (PSR) methodology indicates to have the potential to meet performance objectives. PSR is a tactical asset allocation methodology, which attempts to identify the best performing sectors at a given point in time. The SDBA strategies utilize the HCM-BuyLine® proprietary indicator to monitor market conditions and assist in determining whether or not assets should be invested in equity products or moved to cash, cash equivalents, or bond funds. Multiple indicators are monitored in an effort to identify such trends in the equity markets. The strategy is rebalanced periodically, and it is possible for the allocation to be adjusted, including when the HCM-BuyLine® indicates a strengthening or weakening of the equity markets. The net asset value per share of this HCM program will fluctuate as the value of the securities within the portfolio change. Because this Howard Capital Management, Inc. (HCM) strategy is actively managed, it may experience above-average turnover, which could have a negative impact on account performance. Naturally, there can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine®, market conditions, and delays in executing orders. It is not an actual stoploss order that automatically sells securities in the portfolio at a certain price.

Comparative Benchmark. Aggressive- S&P 500 Monthly Reinvested Index (20%), HFRX Equity Hedge Index (80%). Growth-. S&P 500 Monthly Reinvested Index (20%), HFRX Equity Hedge Index (60%), Barclays Capital US Aggregate Bond TR Index (20%). Balanced- S&P 500 Monthly Reinvested Index (5%), HFRX Equity Hedge Index (60%), Barclays Capital US Aggregate Bond TR Index (35%). Conservative- S&P 500 Monthly Reinvested Index (5%), HFRX Equity Hedge Index (40%), Barclays Capital US Aggregate Bond TR Index (55%). S&P 500 Reinvested is a gauge of the large cap U.S. equities market. The index includes 500 leading companies in leading industries of the U.S. economy, capturing 75% coverage of U.S. equities. S&P 500 Reinvested assumes dividends are reinvested. Visit <http://www.standardandpoors.com/indices> for more information regarding Standard & Poor's indices. HFRX Equity Hedge Index is constructed using a UCITSIII compliant methodology, which is based on defined and predetermined rules and objective criteria to select and rebalance components to maximize representation of the Hedge Fund Universe. HFRX Indices utilize quantitative techniques and analysis, multi-level screening, cluster analysis, Monte-Carlo simulations and optimization techniques to ensure that each Index is a pure representation of its corresponding investment focus. Full strategy and regional descriptions (multi-language), as well as the full "HFRX Hedge Fund Indices Defined Formulaic Methodology" may be downloaded at www.hfrx.com. Barclays Capital US Aggregate Bond TR Index is a broad-based benchmark that measures the investment grade, US dollar-denominated, fixed-rate taxable bond market, including Treasuries, government-related and corporate securities, MBS (agency fixed-rate and hybrid ARM passthroughs), ABS, and CMBS. The US Aggregate rolls up into other Barclays Capital flagship indices such as the multi-currency Global Aggregate Index and the US Universal Index, which includes high yield and emerging markets debt. The US Aggregate Index was created in 1986, with index history backfilled to January 1, 1976. Total Return (TR) assumes yield is reinvested. Visit <https://ecommerce.barcap.com/indices> for more information regarding Barclays Capital indices. Indices are unmanaged investment measures and are not available for investment purposes.

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All investment approaches have the potential for loss as well as gain. There is no certainty that any investment or strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or successful in achieving investment objectives. Please work with your financial professional to determine which investment program is consistent with your financial objectives and risk tolerance. LASS.SDBA.MO.082420