



**BENJAMIN F. EDWARDS<sup>®</sup>**  
INVESTMENTS *for* GENERATIONS<sup>®</sup>

## Trade Away Disclosure for Period of July 1, 2019 - September 30, 2019

The information in this document is supplemental to the material provided in [Benjamin F. Edwards' \(BFE\) Wrap Fee Program Brochure](#). This information is intended for clients who participate, or are considering participating, in BFE advisory programs. It is intended to provide a general idea of the frequency, if any, of "step out" trades performed by third-party money managers (Managers) as well as a summary of costs associated with the trades.

Step out trading occurs when Managers choose to execute trades away from BFE's primary custodian, Pershing LLC. Managers may choose to do this for a variety of reasons including to fulfil their obligation to seek the best execution for their clients' orders, or to access better liquidity.

Some Managers have provided trade information for their entire program while others provided trade details specific to Benjamin F. Edwards clients. In either case, this document is designed to provide insight into each Manager's practices so that clients may make informed decisions as to whether to participate in Benjamin F. Edwards advisory programs.

All of the data provided herein was supplied directly by the respective Manager. BFE has not independently verified this information. For more information, please see the section in [BFE's Wrap Fee Program Firm Brochure](#) titled Transactions Executed Away from Pershing or contact your Benjamin F. Edwards financial advisor.

PGI							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Spectrum Preferred	25	3	9071	2507	229,862	62,340	0.0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Benefit sought is to seek best execution with minimal market disruption during periods of optimal liquidity. This is especially relevant for new issues as desired quantities are easier to source prior to exchange listing by executing block trades. There are no costs (mark-up/down or commissions) imbedded in the price of trades to sponsors.						

Mariner Fixed Income							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Taxable Core	15	15	265000	265000	281037.55	281037.55	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	As an asset manager, we have a fiduciary duty to pursue best execution for our clients. Trading away often leads to best possible trading results for the client. In every case, we weight the potential additional costs against the opportunity to capture additional yield for the client to ensure that the client's net cost is the best available.						

Mariner Fixed Income							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Taxable Intermediate	15	15	175000	175000	182907.25	182907.25	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	As an asset manager, we have a fiduciary duty to pursue best execution for our clients. Trading away often leads to best possible trading results for the client. In every case, we weight the potential additional costs against the opportunity to capture additional yield for the client to ensure that the client's net cost is the best available.						

<b>Mariner Fixed Income</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Municipal National	31	31	500000	500000	548238.55	548237.55	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	As an asset manager, we have a fiduciary duty to pursue best execution for our clients. Trading away often leads to best possible trading results for the client. In every case, we weight the potential additional costs against the opportunity to capture additional yield for the client to ensure that the client's net cost is the best available.						

<b>Neuberger Berman</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Municipal-Intermediate	1	1	15000	15000	18943.2	18943.2	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	From time to time, various electronic trading platforms will be used to facilitate the trading of municipals. The associated costs typically range from \$.10 to \$10 per bond, with the higher fee rate of \$10 per bond usually reserved for infrequent instances where very small lot sizes are being traded (e.g., fewer than five bonds). Response will be emailed to EWMComplianceMailbox@benjaminfedwards.com.						

<b>Astor Investment Management LLC</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Sector Allocation	172	132		28836	1493623.72	1354233.26	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	We trade away when we adjust our portfolios and rebalance across all subscribed accounts. We trade away in order to aggregate trades across multiple platforms and achieve better access to liquidity providers. We believe sending trades directly through each custodian would result in worse execution and disparity in returns between client accounts.						

<b>Cumberland Advisors Inc.</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>Total Return Taxable Fixed Income</b>	1	1	1	40000	45286.5	45286.5	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Fixed income trades are block traded for best execution and always step away trades.						

<b>Dana Investment Advisors</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>All Strategies</b>							
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	All Fixed Income trades ARE traded-away. All Equity Trades are NOT traded away.						

<b>Astor Investment Management LLC</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>Dynamic Allocation</b>	338	259		24325	1568604.28	1311573.42	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	We trade away when we adjust our portfolios and rebalance across all subscribed accounts. We trade away in order to aggregate trades across multiple platforms and achieve better access to liquidity providers. We believe sending trades directly through each custodian would result in worse execution and disparity in returns between client accounts.						

<b>Belle Haven Investments</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Ladder PLUS		667					0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, markdowns or commissions.</p> <p>Belle Haven is a fully registered Broker/Dealer as well as a Registered Investment Advisor. Our Broker/Dealer is utilized to service our RIA by allowing us access to the wholesale market. While traditional money managers must source their bonds through several Broker/Dealers via institutional coverage, each charging a mark-up (or mark-down), we are able to eliminate the need for such an inefficient process and directly source our bonds on the bid side of the market. We are effectively removing a middleman from the transaction. By exploiting this inherent inefficiency in the fixed income space, we are able to generate alpha without having to rely solely upon elevated credit or interest rate risk for increased alpha generation.</p>						

<b>Belle Haven Investments</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Taxable PLUS		558					0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, markdowns or commissions.</p> <p>Belle Haven is a fully registered Broker/Dealer as well as a Registered Investment Advisor. Our Broker/Dealer is utilized to service our RIA by allowing us access to the wholesale market. While traditional money managers must source their bonds through several Broker/Dealers via institutional coverage, each charging a mark-up (or mark-down), we are able to eliminate the need for such an inefficient process and directly source our bonds on the bid side of the market. We are effectively removing a middleman from the transaction. By exploiting this inherent inefficiency in the fixed income space, we are able to generate alpha without having to rely solely upon elevated credit or interest rate risk for increased alpha generation.</p>						

<b>BELLE HAVEN INVESTMENTS</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
MUNI PLUS		299					0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, markdowns or commissions.</p> <p>Belle Haven is a fully registered Broker/Dealer as well as a Registered Investment Advisor. Our Broker/Dealer is utilized to service our RIA by allowing us access to the wholesale market. While traditional money managers must source their bonds through several Broker/Dealers via institutional coverage, each charging a mark-up (or mark-down), we are able to eliminate the need for such an inefficient process and directly source our bonds on the bid side of the market. We are effectively removing a middleman from the transaction. By exploiting this inherent inefficiency in the fixed income space, we are able to generate alpha without having to rely solely upon elevated credit or interest rate risk for increased alpha generation.</p>						

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<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
TAXABLE LADDER PLUS		77					0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>We will trade away 100% of the time as we utilize our own broker/dealer to execute trades, which has allowed us to provide best execution as we do not charge mark-ups, markdowns or commissions.</p> <p>Belle Haven is a fully registered Broker/Dealer as well as a Registered Investment Advisor. Our Broker/Dealer is utilized to service our RIA by allowing us access to the wholesale market. While traditional money managers must source their bonds through several Broker/Dealers via institutional coverage, each charging a mark-up (or mark-down), we are able to eliminate the need for such an inefficient process and directly source our bonds on the bid side of the market. We are effectively removing a middleman from the transaction. By exploiting this inherent inefficiency in the fixed income space, we are able to generate alpha without having to rely solely upon elevated credit or interest rate risk for increased alpha generation.</p>						

<b>Montag &amp; Caldwell, LLC</b>							
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Large Cap Growth	16	11	11	94	10189.31	9292.37	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>M&amp;C aggregates program trade orders - which are buy or sell decisions implemented across all of the managed accounts for which we have discretionary authority and/or trading authorization - for Wrap/SMA relationships as well as Institutional and Mutual Fund orders and then applies the step-out process. M&amp;C selects brokers from an approved brokers list jointly formulated by Trading and Research. M&amp;C does not have any affiliated broker-dealers. By aggregating client orders and selecting a broker based upon liquidity and anonymity, M&amp;C seeks to minimize factors that can influence the cost of executions like market impact and opportunity costs. It should also be noted that the aggregation of client orders limits price variation which minimizes performance dispersion among clients. While Wrap/SMA's do participate in step-out trading, the executing broker receives no credit for the trade (i.e., the commissions are waived).</p>						

<b>Brandes Investment Partners L.P.</b>							
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Global Balanced	7	2	19810	13376	314575.3	102510.19	245.57
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates. Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.</p>						



Brandes Investment Partners L.P.							
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European Equity	40	12	45694	8081	512468.31	111988.65	163.41
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates. Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.						

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Global Equity	25	6	88575	44777	1712819.97	605722.62	966.19
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates. Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.						

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Global Small Mid Cap Equity	34	12	75239	55504	666456.64	373940.8	534.59
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates. Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.						

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International Equity	72	31	133991	92584	1454455.16	1112774.58	1578.44
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates. Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.						

Brandes Investment Partners L.P.							
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Emerging Market Value Equity	61	14	56270	14819	722398.23	202297.12	303.38
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Although we manage each client account individually, we will often aggregate, for execution as a single transaction, orders for the purchase or sale of a particular security when we are provided the discretion to direct brokerage. We do this for best execution purposes. This helps enable us to prevent information leakage by directing the entire order to a discreet institutional broker(s), leverage the large order size to get in touch with large sellers/buyers, reduce our foot print in the market, utilize principal trading when needed, and negotiate better commission rates. Benefits of aggregation manifest themselves in our best execution monitoring effort. Using a third-party execution quality analysis package provided by IHS Markit, we see consistency in the performance of stepouts relative to measures of market and price impact. To ensure our explicit costs are in line with the industry, we contrast our commission rates at least annually against industry levels using data from Greenwich Associates and make adjustments accordingly.						

Invesco							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
International Growth	2361	78	71809	33127	1759450.26	817141.07	1.94
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Invesco's policy and fiduciary obligation is to seek best execution on each transaction undertaken on behalf of its clients. Traders may aggregate orders (for accounts that allow aggregation) and may trade away from WRAP sponsors when seeking best execution. Invesco's best execution process includes choosing a broker and executing the trade in such a manner that the total costs or proceeds in the transaction are the most favorable under the circumstances.						



Invesco							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
International Core Equity	56	12	1287	510	25286.79	9841.16	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Invesco's policy and fiduciary obligation is to seek best execution on each transaction undertaken on behalf of its clients. Traders may aggregate orders (for accounts that allow aggregation) and may trade away from WRAP sponsors when seeking best execution. Invesco's best execution process includes choosing a broker and executing the trade in such a manner that the total costs or proceeds in the transaction are the most favorable under the circumstances.						

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US Real Estate Securities	13966	484	189401	74922	11163022.16	4309725.03	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Invesco's policy and fiduciary obligation is to seek best execution on each transaction undertaken on behalf of its clients. Traders may aggregate orders (for accounts that allow aggregation) and may trade away from WRAP sponsors when seeking best execution. Invesco's best execution process includes choosing a broker and executing the trade in such a manner that the total costs or proceeds in the transaction are the most favorable under the circumstances.						

Good Harbor Financial, LLC							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Tactical Core US	26	26	15301	15301	1640352.44	1640352.44	0.01
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Reduce market impact of trade by placing one aggregated order across multiple platforms and to reduce dispersion for all clients.						

Miller Tabak Asset Management							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Miller Tabak Short Duration							
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	We trade away from BF Edwards to obtain best execution for our clients.						

Miller Tabak Asset Management							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Miller Tabak Intermediate Duration							
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	We trade away from BF Edwards to obtain best execution for our clients.						

Miller Tabak Asset Management							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Miller Tabak Enhanced Duration							
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	We trade away from BF Edwards to obtain best execution for our clients.						

Kayne Anderson Rudnick							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Small Cap Core	15	2	2199	1538	154373	120282	18.46
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Trading away (i.e., step outs) has many advantages, including, without limitation, less price dispersion across all of our client accounts by allowing us to bunch executions, limiting exposure to information leakage and high frequency traders, and allowing us to be more nimble in our trading, thereby avoiding potential delay costs. Managing a single block improves our ability to achieve better execution than can be accomplished through a series of small transactions with multiple sponsor firms. Therefore, we view step out trading as a critical process for seeking best execution.						

Kayne Anderson Rudnick							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Small Cap Quality Value	106	3	5114	3014	181021	66574	117.65
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Trading away (i.e., step outs) has many advantages, including, without limitation, less price dispersion across all of our client accounts by allowing us to bunch executions, limiting exposure to information leakage and high frequency traders, and allowing us to be more nimble in our trading, thereby avoiding potential delay costs. Managing a single block improves our ability to achieve better execution than can be accomplished through a series of small transactions with multiple sponsor firms. Therefore, we view step out trading as a critical process for seeking best execution.						

Crossmark Global Investments							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Crossmark Municipal Fixed Income	11	11	640000	640000	676554	676554	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Crossmark is required to trade away per the custodian. If we could not trade away and do direct trade, that would be much more efficient.						

<b>Abner Herrman &amp; Brock</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Investment Grade Taxable Bond, Investment Grade Municipal Bond							0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	N/A						

<b>CARRET ASSET MANAGEMENT, LLC</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Enhanced Cash	324	324	62000000	62000000	61700000	61700000	
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Please contact Carret Asset Management, LLC at mbyrd@carret.com to request a full copy of our policy.						

<b>CARRET ASSET MANAGEMENT, LLC</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Opportunity Fixed Income	535	440	13100000	13000000	14600000	13400000	
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Please contact Carret Asset Management, LLC at mbyrd@carret.com to request a full copy of our policy.						

<b>CARRET ASSET MANAGEMENT, LLC</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>Municipal Fixed Income</b>	815	815	37000000	37000000	41100000	41100000	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Please contact Carret Asset Management, LLC at mbyrd@carret.com to request a full copy of our policy.						

<b>CARRET ASSET MANAGEMENT, LLC</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>Taxable Fixed Income</b>	896	768	31600000	31500000	34000000	32400000	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Please contact Carret Asset Management, LLC. at mbyrd@carret.com to request a full copy of our policy.						

<b>RiverFront Investment Group</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>ETF Global Allocation</b>	4180	2110	230265	199458	15990213	13721942	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	Please note the information above is based on RiverFront firm-level trading. It includes trading done on behalf of Lockwood as well as other Sponsor Firms, but is not specific to Benjamin Edwards accounts. Please note that this data was compiled to the best of our ability given system constraints and limitations and the information disclosed to us by executing brokers. Information regarding the benefit sought by trading away and benefits realized will be emailed separately.						

RiverFront Investment Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
ETF Dynamic Equity Income	9830	4496	425352	343987	32946080	27356144	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Please note the information above is based on RiverFront firm-level trading. It includes trading done on behalf of Lockwood as well as other Sponsor Firms, but is not specific to Benjamin Edwards accounts. Please note that this data was compiled to the best of our ability given system constraints and limitations and the information disclosed to us by executing brokers. Information regarding the benefit sought by trading away and benefits realized will be emailed separately.						

RiverFront Investment Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Dynamic Equity Income	30157	15099	2110403	1877137	174356258	159156816	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Please note the information above is based on RiverFront firm-level trading. It includes trading done on behalf of Lockwood as well as other Sponsor Firms, but is not specific to Benjamin Edwards accounts. Please note that this data was compiled to the best of our ability given system constraints and limitations and the information disclosed to us by executing brokers. Information regarding the benefit sought by trading away and benefits realized will be emailed separately.						

RiverFront Investment Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Moderate Growth & Income	33207	15949	2610793	2268848	168993997	143042437	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Please note the information above is based on RiverFront firm-level trading. It includes trading done on behalf of Lockwood as well as other Sponsor Firms, but is not specific to Benjamin Edwards accounts. Please note that this data was compiled to the best of our ability given system constraints and limitations and the information disclosed to us by executing brokers. Information regarding the benefit sought by trading away and benefits realized will be emailed separately.						



Penn Capital Management Co., Inc.							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Small Cap Equity	230	225	11444	11444	167440	167440	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Penn Capital will trade away when we believe doing so will achieve best execution for the client. Best execution typically refers to the ability to obtain, based on a number of factors, favorable price, commissions, promptness and reliability of execution, confidentiality, and placement accorded the trade order. Accordingly, best execution is not necessarily measured by the circumstances surrounding a single transaction, but should be measured over time through consideration and analysis of multiple transactions. Trading away does not incur any additional costs for the end client. Penn Capital's Best Execution Committee reviews equity trades quarterly to ensure we are receiving best execution for our clients.						

Penn Capital Management Co., Inc.							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Penn Capital Small to Mid Cap Equity	172	53	6012	576	218173	25852	0
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	Penn Capital will trade away when we believe doing so will achieve best execution for the client. Best execution typically refers to the ability to obtain, based on a number of factors, favorable price, commissions, promptness and reliability of execution, confidentiality, and placement accorded the trade order. Accordingly, best execution is not necessarily measured by the circumstances surrounding a single transaction, but should be measured over time through consideration and analysis of multiple transactions. Trading away does not incur any additional costs for the end client. Penn Capital's Best Execution Committee reviews equity trades quarterly to ensure we are receiving best execution for our clients.						

Nuveen Asset Management							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Updated Intermediate	143	143	5930000	5930000	7100038.2	7100038.2	
If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details	<p>Regarding question 15: Where Nuveen Asset Management trades away, clients generally incur transaction costs and fees in addition to the wrap fee. These fees are generally in the form of mark-ups and mark-downs, or spreads, earned by the relevant securities dealer (not Nuveen Asset Management or a Nuveen affiliate) in addition to the wrap fee payable to the wrap program sponsor.</p> <p>Question 16: When Nuveen Asset Management believes that the broker-dealer serving as managed account program sponsor or custodian or a broker-dealer that is otherwise designated by a client cannot provide best execution, Nuveen seeks to trade away from such broker-dealer to the extent necessary and if permitted under the relevant agreement. Nuveen seeks best execution in order to obtain the best price, under the specific circumstances, when buying and selling municipal bonds for client accounts.</p> <p>Nuveen Asset Management has established a Municipal Separately Managed Accounts ("SMA") Best Execution Committee, which is responsible for reviewing, evaluating and reporting its conclusions regarding the quality of Nuveen Asset Management's municipal trading activities with respect to SMA accounts to ensure that such client accounts receive execution quality consistent with standards established by Nuveen Asset Management. The Municipal SMA Best Execution Committee meets periodically and its responsibilities include, but are not limited to, the review of internally prepared reports analyzing execution of securities and making any necessary recommendations to address deviations from the execution standards set forth, including communicating with sponsors to address execution issues.</p>						

Nuveen Asset Management							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Limited Maturity	6	6	280000	280000	321198.45	321198.45	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>Regarding question 15: Where Nuveen Asset Management trades away, clients generally incur transaction costs and fees in addition to the wrap fee. These fees are generally in the form of mark-ups and mark-downs, or spreads, earned by the relevant securities dealer (not Nuveen Asset Management or a Nuveen affiliate) in addition to the wrap fee payable to the wrap program sponsor.</p> <p>Question 16: When Nuveen Asset Management believes that the broker-dealer serving as managed account program sponsor or custodian or a broker-dealer that is otherwise designated by a client cannot provide best execution, Nuveen seeks to trade away from such broker-dealer to the extent necessary and if permitted under the relevant agreement. Nuveen seeks best execution in order to obtain the best price, under the specific circumstances, when buying and selling municipal bonds for client accounts.</p> <p>Nuveen Asset Management has established a Municipal Separately Managed Accounts ("SMA") Best Execution Committee, which is responsible for reviewing, evaluating and reporting its conclusions regarding the quality of Nuveen Asset Management's municipal trading activities with respect to SMA accounts to ensure that such client accounts receive execution quality consistent with standards established by Nuveen Asset Management. The Municipal SMA Best Execution Committee meets periodically and its responsibilities include, but are not limited to, the review of internally prepared reports analyzing execution of securities and making any necessary recommendations to address deviations from the execution standards set forth, including communicating with sponsors to address execution issues.</p>						

Nuveen Asset Management							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
1-15 Year Ladder	18	18	195000	195000	237087.75	237087.75	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	<p>Regarding question 15: Where Nuveen Asset Management trades away, clients generally incur transaction costs and fees in addition to the wrap fee. These fees are generally in the form of mark-ups and mark-downs, or spreads, earned by the relevant securities dealer (not Nuveen Asset Management or a Nuveen affiliate) in addition to the wrap fee payable to the wrap program sponsor.</p> <p>Question 16: When Nuveen Asset Management believes that the broker-dealer serving as managed account program sponsor or custodian or a broker-dealer that is otherwise designated by a client cannot provide best execution, Nuveen seeks to trade away from such broker-dealer to the extent necessary and if permitted under the relevant agreement. Nuveen seeks best execution in order to obtain the best price, under the specific circumstances, when buying and selling municipal bonds for client accounts.</p> <p>Nuveen Asset Management has established a Municipal Separately Managed Accounts ("SMA") Best Execution Committee, which is responsible for reviewing, evaluating and reporting its conclusions regarding the quality of Nuveen Asset Management's municipal trading activities with respect to SMA accounts to ensure that such client accounts receive execution quality consistent with standards established by Nuveen Asset Management. The Municipal SMA Best Execution Committee meets periodically and its responsibilities include, but are not limited to, the review of internally prepared reports analyzing execution of securities and making any necessary recommendations to address deviations from the execution standards set forth, including communicating with sponsors to address execution issues.</p>						

<b>Cincinnati Asset Management Inc.</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Investment Grade Fixed Income	2	2	7	7	7539.63	7539.63	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	We trade away 100% of our transactions. Specifically, trading is done on a block basis, away for all portfolios having investable cash through a network of 35+ Broker Dealers. Trades are executed on an Institutional or "net" basis and there are no commissions. The purpose of this approach is to achieve best execution for our clients.						

<b>Cincinnati Asset Management Inc.</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
Broad Market Fixed Income	38	38		195	203515	203515	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	We trade away 100% of our transactions. Specifically, trading is done on a block basis, away for all portfolios having investable cash through a network of 35+ Broker Dealers. Trades are executed on an Institutional or "net" basis and there are no commissions. The purpose of this approach is to achieve best execution for our clients.						

<b>Legg Mason Private Portfolio Group</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
ClearBridge All Cap Growth	296	40	9344	5305	688371.86	421298.85	76.82
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	As is more fully described in Item 12 of Legg Mason Private Portfolio Group, LLC's (LMPPG), Form ADV brochure, LMPPG executes all or substantially all "model change" trades on behalf of its managed account program clients as an aggregated block trade through a single broker-dealer instead of executing such trades with each client's sponsor firm or designated broker as LMPPG believes that handling such trades in such manner enhances its ability to obtain best execution for client accounts. Item 12 of LMPPG's Form ADV brochure also describes the trade cost analysis that LMPPG does on significant block trades in an effort to monitor that the block trading method utilized by LMPPG is consistent with its obligation to seek best execution for client transactions. The trade cost analysis includes any implied commissions paid as such charges are reflected in the total security price or proceeds.						

Legg Mason Private Portfolio Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
ClearBridge Dividend Strategy	28	28	4874	4874	326699.78	326699.78	78.37
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	As is more fully described in Item 12 of Legg Mason Private Portfolio Group, LLC's (LMPPG), Form ADV brochure, LMPPG executes all or substantially all "model change" trades on behalf of its managed account program clients as an aggregated block trade through a single broker-dealer instead of executing such trades with each client's sponsor firm or designated broker as LMPPG believes that handling such trades in such manner enhances its ability to obtain best execution for client accounts. Item 12 of LMPPG's Form ADV brochure also describes the trade cost analysis that LMPPG does on significant block trades in an effort to monitor that the block trading method utilized by LMPPG is consistent with its obligation to seek best execution for client transactions. The trade cost analysis includes any implied commissions paid as such charges are reflected in the total security price or proceeds.						

Legg Mason Private Portfolio Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
ClearBridge International Value ADR	3	3	389	389	5177.26	5177.26	2.01
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	As is more fully described in Item 12 of Legg Mason Private Portfolio Group, LLC's (LMPPG), Form ADV brochure, LMPPG executes all or substantially all "model change" trades on behalf of its managed account program clients as an aggregated block trade through a single broker-dealer instead of executing such trades with each client's sponsor firm or designated broker as LMPPG believes that handling such trades in such manner enhances its ability to obtain best execution for client accounts. Item 12 of LMPPG's Form ADV brochure also describes the trade cost analysis that LMPPG does on significant block trades in an effort to monitor that the block trading method utilized by LMPPG is consistent with its obligation to seek best execution for client transactions. The trade cost analysis includes any implied commissions paid as such charges are reflected in the total security price or proceeds.						

Legg Mason Private Portfolio Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
ClearBridge Large Cap Growth	510	38	6742	1737	836140.18	166453.04	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	As is more fully described in Item 12 of Legg Mason Private Portfolio Group, LLC's (LMPPG), Form ADV brochure, LMPPG executes all or substantially all "model change" trades on behalf of its managed account program clients as an aggregated block trade through a single broker-dealer instead of executing such trades with each client's sponsor firm or designated broker as LMPPG believes that handling such trades in such manner enhances its ability to obtain best execution for client accounts. Item 12 of LMPPG's Form ADV brochure also describes the trade cost analysis that LMPPG does on significant block trades in an effort to monitor that the block trading method utilized by LMPPG is consistent with its obligation to seek best execution for client transactions. The trade cost analysis includes any implied commissions paid as such charges are reflected in the total security price or proceeds.						

Legg Mason Private Portfolio Group							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
ClearBridge Multi Cap Growth	45	6	19891	7594	682776.96	116437.99	101.88
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	As is more fully described in Item 12 of Legg Mason Private Portfolio Group, LLC's (LMPPG), Form ADV brochure, LMPPG executes all or substantially all "model change" trades on behalf of its managed account program clients as an aggregated block trade through a single broker-dealer instead of executing such trades with each client's sponsor firm or designated broker as LMPPG believes that handling such trades in such manner enhances its ability to obtain best execution for client accounts. Item 12 of LMPPG's Form ADV brochure also describes the trade cost analysis that LMPPG does on significant block trades in an effort to monitor that the block trading method utilized by LMPPG is consistent with its obligation to seek best execution for client transactions. The trade cost analysis includes any implied commissions paid as such charges are reflected in the total security price or proceeds.						

Loomis Sayles							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
We trade away -	10	10	150000	150000	180956.9	180956.9	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	With respect to the fixed income, municipal bond strategies managed on the Lockwood managed accounts platform, Loomis Sayles executes virtually all transactions through broker-dealers other than the SMA program sponsors where Loomis Sayles believes that such trades would result in the most favorable price and execution under the circumstances. Loomis Sayles participates in multiple SMA programs and also manages institutional and other non-SMA accounts. When deemed to be in the best interests of its clients, orders for the same security are combined or "batched" to obtain more favorable execution including better pricing and enhanced investment opportunities than would otherwise be available if such orders were not aggregated. In order to satisfy its obligation to seek best execution, Loomis Sayles selects broker-dealers which it believes have the ability to achieve the most favorable net price and execution for transactions under the circumstances. The firm trades with over 100 fixed income dealers. Both qualitative and quantitative criteria are used to evaluate and select between the various dealers that are capable of executing a trade. Execution considerations may include the size and breadth of the market for the security; size and difficulty of executing and order; block positioning; net price; quality of execution, market intelligence and knowledge regarding trading activity; reliability, willingness and ability to commit capital; willingness to execute difficult transactions; financial strength; and maintaining confidentiality and anonymity of trading activity.						

Loomis Sayles							
Manager's Style	Total # of Trades	Total # of Trades Done Away	Total # of Shares/Units Traded	Total # of Shares/Units Done Away	Total \$ Value of Trades	Total \$ Value of Trades Done Away	Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)
Intermediate Municipal	6	6	65000	65000	73113.25	73113.25	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	With respect to the fixed income, municipal bond strategies managed on the Lockwood managed accounts platform, Loomis Sayles executes virtually all transactions through broker-dealers other than the SMA program sponsors where Loomis Sayles believes that such trades would result in the most favorable price and execution under the circumstances. Loomis Sayles participates in multiple SMA programs and also manages institutional and other non-SMA accounts. When deemed to be in the best interests of its clients, orders for the same security are combined or "batched" to obtain more favorable execution including better pricing and enhanced investment opportunities than would otherwise be available if such orders were not aggregated. In order to satisfy its obligation to seek best execution, Loomis Sayles selects broker-dealers which it believes have the ability to achieve the most favorable net price and execution for transactions under the circumstances. The firm trades with over 100 fixed income dealers. Both qualitative and quantitative criteria are used to evaluate and select between the various dealers that are capable of executing a trade. Execution considerations may include the size and breadth of the market for the security; size and difficulty of executing and order; block positioning; net price; quality of execution, market intelligence and knowledge regarding trading activity; reliability, willingness and ability to commit capital; willingness to execute difficult transactions; financial strength; and maintaining confidentiality and anonymity of trading activity.						



<b>Loomis Sayles</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away</b> (mark-ups, mark downs, commissions, etc.)
<b>Government/Credit</b>	186	186	9756000	9756000		10377827.52	
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	With respect to the fixed income, municipal bond strategies managed on the Lockwood managed accounts platform, Loomis Sayles executes virtually all transactions through broker-dealers other than the SMA program sponsors where Loomis Sayles believes that such trades would result in the most favorable price and execution under the circumstances. Loomis Sayles participates in multiple SMA programs and also manages institutional and other non-SMA accounts. When deemed to be in the best interests of its clients, orders for the same security are combined or "batched" to obtain more favorable execution including better pricing and enhanced investment opportunities than would otherwise be available if such orders were not aggregated. In order to satisfy its obligation to seek best execution, Loomis Sayles selects broker-dealers which it believes have the ability to achieve the most favorable net price and execution for transactions under the circumstances. The firm trades with over 100 fixed income dealers. Both qualitative and quantitative criteria are used to evaluate and select between the various dealers that are capable of executing a trade. Execution considerations may include the size and breadth of the market for the security; size and difficulty of executing and order; block positioning; net price; quality of execution, market intelligence and knowledge regarding trading activity; reliability, willingness and ability to commit capital; willingness to execute difficult transactions; financial strength; and maintaining confidentiality and anonymity of trading activity.						

<b>Capital Research and Management Company (CRMC)</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away</b> (mark-ups, mark downs, commissions, etc.)
<b>Capital Group International Equity SMA</b>	434	295	13709	12500	289204.48	221696.43	632.27
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	The sponsor firm is generally responsible for trading and trade execution. However, for discretionary SMA services, we may elect to step out a trade when we believe that doing so will provide a better outcome than sending that trade to the sponsor firm, taking into account various factors, including the lack of liquidity in the market for a particular security. Currently, we generally only steps-out trades in ADRs where we seek to access liquidity in the local market, leveraging the expertise of our global trading team. Step-out trades are subject to our normal Best Execution process.						

<b>Capital Research and Management Company (CRMC)</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away</b> (mark-ups, mark downs, commissions, etc.)
<b>Capital Group US Equity SMA</b>	360	11	3551	811	274975.37	24404	810.95
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	The sponsor firm is generally responsible for trading and trade execution. However, for discretionary SMA services, we may elect to step out a trade when we believe that doing so will provide a better outcome than sending that trade to the sponsor firm, taking into account various factors, including the lack of liquidity in the market for a particular security. Currently, we generally only steps-out trades in ADRs where we seek to access liquidity in the local market, leveraging the expertise of our global trading team. Step-out trades are subject to our normal Best Execution process.						



<b>Capital Research and Management Company (CRMC)</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>Capital Group Global Equity SMA</b>	120	0	2109	0	101906.22	0	0
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	The sponsor firm is generally responsible for trading and trade execution. However, for discretionary SMA services, we may elect to step out a trade when we believe that doing so will provide a better outcome than sending that trade to the sponsor firm, taking into account various factors, including the lack of liquidity in the market for a particular security. Currently, we generally only steps-out trades in ADRs where we seek to access liquidity in the local market, leveraging the expertise of our global trading team. Step-out trades are subject to our normal Best Execution process						

<b>Capital Research and Management Company (CRMC)</b>							
<b>Manager's Style</b>	<b>Total # of Trades</b>	<b>Total # of Trades Done Away</b>	<b>Total # of Shares/Units Traded</b>	<b>Total # of Shares/Units Done Away</b>	<b>Total \$ Value of Trades</b>	<b>Total \$ Value of Trades Done Away</b>	<b>Total of all added fees/costs associated with trades done away (mark-ups, mark downs, commissions, etc.)</b>
<b>Capital Group World Dividend Growers SMA</b>	45	4	645	143		20350.14	3380.18
<b>If applicable, manager explanation of benefits sought by trading away, if benefits sought justified additional costs incurred and any other relevant details</b>	The sponsor firm is generally responsible for trading and trade execution. However, for discretionary SMA services, we may elect to step out a trade when we believe that doing so will provide a better outcome than sending that trade to the sponsor firm, taking into account various factors, including the lack of liquidity in the market for a particular security. Currently, we generally only steps-out trades in ADRs where we seek to access liquidity in the local market, leveraging the expertise of our global trading team. Step-out trades are subject to our normal Best Execution process.						

## Firms That Indicated No Trade Aways Were Performed

Manager	Strategy
12th Street Asset Management	Opportunity Managed Account
ACR Alpine Capital Research, LLC	Equity Quality Return Strategy (EQR)
Advisors Asset Management obo Bahl and Gaynor Investment Counsel, Inc	Income Growth
Anchor Capital Advisors LLC	Anchor Capital does not trade away for all strategies.
Anchor Capital Advisors LLC	Anchor does not trade away for "all strategies".
ARK Investment Management LLC.	ARK Disruptive Innovation (Global Impact Growth)
Atalanta Sosnoff Capital	All Strategies
Birmingham Capital Management	Large Cap Value Equity
Bluestone Capital Management	Bluestone Elite
Boston Partners Global Investors, Inc.	All Strategies
Brandes Investment Partners L.P.	U.S. Value Equity
Capital Wealth Planning, LLC	Enhanced Dividend Income Portfolio
Churchill Management Group	All Strategies
CIBC Private Wealth Advisors	CIBC All Cap Growth
Columbia Threadneedle Investments	all strategies
Confluence Investment Management	all strategies
Congress Asset Management	All Strategies
Congress Asset Management	all strategies
Copeland Capital Management LLC	All strategies

## Firms That Indicated No Trade Aways Were Performed

Manager	Strategy
CORTLAND ASSOCIATES INC	ALL STRATEGIES
Cortland Associates, Inc.	All Cap Value
Cypress Capital	LTG/US Opp
Cypress Capital	tmac/asset neutral
Cypress Captial	TMAC EF/Global Allocation
Davis Selected Advisers L.P. dba Davis Advisors	All Strategies
Dearborn Partners	All Strategies
Dearborn Partners LLC	All strategies
Delaware Investments	Large Cap Value
Eads & Heald Wealth Management	All Strategies
Equity Investment Corporation	ALL CAP VALUE
Fayez Sarofim & Co.	Large Cap Equity
Federated Investors	All strategies
First Trust Advisors	all strategies
Fred Alger Mgmt, LLC	All Strategies
Great Lakes Advisors	All Strategies
Hilton Capital Management, LLC	All Strategies
Hilton Capital Management, LLC	all strategies
Janus Henderson Investors	All strategies
Jeffrey Pike	All Strategies

## Firms That Indicated No Trade Aways Were Performed

Manager	Strategy
Julex Capital Management, LLC	Julex Dynamic Sector
Kayne Anderson Rudnick	Small-Mid Cap Core
L&S Advisors, Inc.	All strategies
Logan Capital Management	Dividend Performers
Mench Financial, Inc.	ALL STRATEGIES
Miller/Howard Investments, Inc.	All Strategies
Navellier & Associates	all strategies
Neuberger Berman	Large-Cap Discipline Growth
NorthCoast Asset Management	CAN SLIM
Nuance Investments	Mid Cap Value
Nuveen Investments	All Strategies
Perkins Capital Management Inc	Equity Growth (we do not trade away)
PVG Asset Management Corporation	Loss Averse Equity Income, Tactical Total Return
Reinhart Partners	All Equity Strategies
Rice Hall James & Associates LLC	all strategies
Riverbridge Partners	All Strategies
Salient Capital Advisors, LLC	MLP
Sandhill Investment Management	All
Santa Barbara Asset Management, LLC	Dividend Growth
Schafer Cullen Capital Management	All Strategies