Economic Cycle Allocation Program

STATEMENT OF INVESTMENT POLICY AND OBJECTIVES

A. Purpose

The Client and the team at Monument Associates have entered into an agreement for the management of an investment portfolio. This document is set forth to establish a clear understanding between the Client, the Financial Advisor and the Portfolio Manager as to the role of the parties, the investment policy, the objectives, the guidelines for the investment of the account, as well as the procedures to be followed by the Portfolio Manager and Financial Advisor.

B. Role of the Parties

The Client confirms that the objectives of the account as stated are appropriate and acceptable, and that the investment strategy is suitable. The Financial Advisor is the client-service contact and the intermediary with the Portfolio Manager, who in turn invests the assets with the care, skill and diligence that a prudent man acting in this capacity would undertake. The Financial Advisor and the Portfolio Manager may be one in the same person.

C. Investment Philosophy

The portfolio utilizes TWO proprietary economic models to determine the phase of an economic cycle, and the projected economic growth of different countries and regions. Further, the portfolio will consist of **FOUR** different investment classes, with an optional "Trading" overlay. Each investment class will be weighted based on the results of the investment objective questionnaire:

1) CORE Securities representing various countries and regions as the Global Allocation Class of the portfolio.

2) GROWTH The individual stocks, and other securities, held in this segment of the portfolio will be those that meet the managers' criteria, and will generally have an initial investment of an equal dollar amount between and among each security.

3) INCOME (Preferred Stocks, Government, Corporate, Municipal Bonds, Income oriented Exchange Traded Funds, etc.)

4) CASH (Money Market Funds, CD's, Government Agency debt, Treasury debt.)

***Optional Overlay-TRADING** is designed to generate additional income for a portfolio. This should be used in the event that the client wants greater income/cash flow, than that which the portfolio is generating through dividends and interest.

The primary investment class for "Growth" and "Growth & Income" will be the **CORE** asset class, representing approximately 2900 securities in over 30 countries.

The **CORE** class will consist of investments representing approximately 2900 equities in over 30 countries, and should be considered a diversified global* investment class.

The **INCOME** class will consist primarily of income producing securities (see description above). This investment class is designed to compliment the **CORE** assets and provide income for investors who seek greater income.

The **GROWTH** class will consist primarily of individual stocks or other securities (see description above), which the portfolio manager has evaluated to have long-term potential growth. This investment class is designed to compliment the **CORE** assets and may be more volatile.

The **TRADING** class should be used in the event that the client wants greater income/cash flow, than that which the portfolio is generating through dividends and interest.

The first proprietary model ("Model 1") uses thirteen different economic data points by quantifying and comparing Month over Month and Year over Year changes to each data point to determine whether the US economy is in an expansive or contracting phase. If "Model 1" determines that the economy is in a "*contracting*" phase, the assets will generally be in **CASH** asset (see asset class above) or similar holding. If "Model 1" determines the economy is in an "***expansive***" phase, then the **CORE** assets will be invested according to the second model ("Model 2").

The second proprietary model ("Model 2") is designed to estimate and project the growth in NINE countries and regions. The projections are regularly compared to the economic data of each country and region as they are reported. The countries and regions are ranked in order of projected economic growth, which determines the percentage weighting of each ETF within the **CORE** asset class. The percentage weighting may change periodically if the projections from "Model 2" change.

D. Investment Objectives

Investment performance is to be evaluated over a full market cycle, stated for the purposes of measurement to be not less than a rolling 5-year period. The Consumer Price Index (CPI) reflects inflation as a measure of purchasing power erosion.

For relative performance, this portfolio should be compared equally to the S&P 500 index (50%) and the MSCI EAFA Index (50%)

For evaluation purposes, the following full-cycle benchmark is presented:

❒ S & P 500 Composite Total Return	❒ T Bill – 3 Month Yield
❒ MSCI EAFE Index	❒ Barclays Capital U.S. Aggregate
❒ ________________________	❒ ____________________________

The overall portfolio goal is:

❒ Conservative	❒ Moderately Aggressive
❒ Moderately Conservative	❒ Significant Risk / Speculation
❒ Moderate	

This portfolio is designed to respond to regional and global economic conditions, and allocate assets accordingly, based on the economic conditions of their respective countries and regions. The weighting will be based on the models ranking of projected economic growth of each relative country and region.

When the proprietary models determine that the economy of a country or region, or global economy in general, will not produce growth, the relative ETF(s) will be sold and moved to the **CASH** asset class. If the models determine the global economy is in a contractive phase, the portfolio manager reserves the right to sell all assets. All assets may be sold and moved into the **CASH** asset class.

Maximum capital gain may NOT be the primary objective of the portfolio, as risk-management through asset allocation and security selection is an integral part of the investment methodology. Tax efficiency is NOT the primary objective of the portfolio, although steps may be taken as appropriate to reduce taxable distributions and offset taxable gains if possible or as directed by specific direction of the client.

E. Investment Guidelines:

1. The Portfolio Manager is free to act fully within the asset allocation ranges below. Actual asset allocation levels will fluctuate markedly at various points of the investment cycle.

   Allocation, between the different investment classes (see section “C” above), will depend upon the Investment Category for which each investor qualifies, according to the results of the Portfolio Questionnaire. The following describes the Investment Class allocation range for each of the three Investment Objective categories:

INCOME

	Minimum	**Initial**	**Maximum**
CORE	0%	*	40%
GROWTH	0%	*	15%
INCOME	0%	*	90%
CASH	0%	*	100%

<u>GROWTH & INCOME</u>

	Minimum	Initial	Maximum
CORE	0%	*	80%
GROWTH	0%	*	40%
INCOME	0%	*	60%
CASH	0%	*	100%

<u>GROWTH</u>

	Minimum	Initial	Maximum
CORE	0%	*	90%
GROWTH	0%	*	50%
INCOME	0%	*	30%
CASH	0%	*	100%

***Initial allocation will depend on the results of the Portfolio Questionnaire.**
****<u>NOTE</u>: Minimum and Maximum allocation will attempt to be achieved but can NOT be guaranteed at all times. Causes that may affect the Minimum and Maximum allocation levels include, but are NOT limited to:**
1) Appreciation/Depreciation in value of each "Investment Class";
2) Reclassification by the Manager of securities in any class (i.e. Manager determines that a security in the "Growth Class" should be reclassified as an "Income Class" security based on managers "Investment Class" criteria;
3) Proprietary Models signals a need to shift "Investment Classes" in an effort to minimize exposure and expected RISK to a particular security or "Investment Class" and doing so causes the allocation to fall outside (above or below) the stated Minimum/Maximum ranges for each "Investment Class".

*Typical cash levels. Actual cash balances may be increased at manager's discretion. All Investment Objective categories may hold 100% **CASH** in cases where the proprietary models determine the economy to be in a "Contraction" phase.

1. Equity Investments may be chosen from the NYSE, ASE, regional or foreign exchanges and NASDAQ.

2. Due to diversification, no single stock position should exceed 15% of the total invested funds.

3. Hedging of stock and bond exposure is permitted.

4. Hard assets, including but not limited to precious metals and commodities is permitted.

5. Liquidity is a secondary objective, but securities deemed readily marketable at the time of purchase are to be used. Securities are subject to fluctuation of market value.

6. MARGIN may only be used with client approval in this account.

7. Changes to the investment guidelines above can only be made with written authorization and approval from The Client.

International Investing Disclosure: International investing involves a greater degree of risk and increased volatility. Changes in currency exchange rates and differences in accounting and taxation policies outside the U.S. can raise or lower returns. Also, some overseas markets may not be as politically and economically stable as the United States and other nations. Investments in emerging markets can be more volatile. As mentioned above, the normal risks of investing in foreign countries are heightened when investing in emerging markets. In addition, the small size of securities markets and the low trading volume may lead to a lack of liquidity, which leads to increased volatility. Also, emerging markets may not provide adequate legal protection for private or foreign investment or private property.

G. Procedures:

The Portfolio Manager will make all buy and sell decisions and will direct orders to Raymond James.- Broker Dealer. The Portfolio Manager will provide periodic strategy updates.

The Financial Advisor will provide written confirmation of trades, monthly/quarterly account statements, quarterly performance reports, and periodic asset and activity statements. Unless waived by the Client, a portfolio review meeting will be held between the Client and the Financial Advisor on either an annual basis or when repositioning of the overall portfolio strategy becomes necessary. At such times, this Investment Policy will be reviewed.

H. Notification

Primary investment objective of portfolio: ____

Restrictions/Special Instructions (if any): ____

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Approximate initial investment under management: $ _____________________________________

Account Registration: ____

Account Number: ____

I. Acceptance:

I/We acknowledge receipt of the Investment Policy Statement and approve the content. I/We accept that actual performance cannot be guaranteed to meet the stated objectives and goals.

_______________________________________ Date: ___________________________

Client

_______________________________________ Date: ___________________________

Client

___________________________________ Date: ________________________
Client

___________________________________ Date: ________________________
Client

We acknowledge receipt of the Investment Policy Statement and will endeavor to act according to the stated guidelines.

Company: Monument Wealth Advisors, Raymond James
Address: 6320 Canoga Ave. Ste. 620
Woodland Hills, CA 91367

_____________________________________ Date: _________________________
Financial Advisor

_____________________________________ Date: _________________________
Branch Manager

_____________________________________ Date: _________________________
Portfolio Manager

_____________________________________ Date: _________________________
MWA Partner

CPI-The Consumer Price Index is a measure of inflation compiled by the US Bureau of Labor Studies. Holding stocks for the long-term does not insure a profitable outcome. Investing in stocks always involves risk, including the possibility of losing one's entire investment. The S&P 500 is an unmanaged index of 500 widely held stocks that is generally considered representative of the U.S. stock market. MSCI EAFE (Europe, Australasia, Far East) is a free float-adjusted market capitalization index that is designed to measure developed market equity performance, excluding the United States & Canada. The EAFE consists of the country indices of 22 developed nations. Barclays Capital US Aggregate is an unmanaged market value weighted performance benchmark for investment-grade fixed rate debt issues, including government, corporate, asset backed, mortgage backed securities with a maturity of at least 1 year. Inclusion of these indexes is for illustrative purposes only. Keep in mind that individuals cannot invest directly in any index, and index performance does not include transaction costs or other fees, which will affect actual investment performance. Individual investor's results will vary. Past performance does not guarantee future results. Alternative investments involve substantial risks that may be greater than those associated with traditional investments and are not suitable for all investors. They may be offered only to clients who meet specific suitability requirements, including minimum-net-worth tests. These risks include, but are not limited to, limited liquidity, tax considerations, incentive fee structures, potentially speculative investment strategies, and different regulatory and reporting requirements. Investors should only invest in hedge funds, managed futures, structured products, commodities, real estate or other similar strategies if they do not require a liquid investment and can bear the risk of substantial losses. There is no assurance that any investment will meet its investment objectives or that substantial losses will be avoided. Investors should carefully review any offering materials or prospectuses prior to investing. Commodities and currencies investing are generally considered speculative because of the significant potential for investment loss. Their markets are likely to be volatile and there may be sharp price fluctuations even during periods when prices overall are rising.