Atlas Capital Management
MANAGE THE RISK. MAXIMIZE THE OPPORTUNITY.

FORM CRS – Client Relationship Summary

Atlas Capital Management Corp. (ACMC) is an investment advisor registered with the Securities and Exchange Commission. We feel it is important for you to understand how advisory and brokerage services and fees differ in order to determine which type of account is right for you. There are free and simple tools available to research firms and financial professionals at www.investor.gov/CRS which also provides educational materials about investment advisors, broker-dealers and investing.

What types of investment services and advice can you provide me?

Discretionary Investment Management: ACMC offers fee-based discretionary investment management services to individuals, pension and profit-sharing plans, trusts, estates, charitable organizations, and business entities. If you open an account with our firm, a financial professional will meet with you to understand your current financial situation, existing resources, goals and risk tolerance. The financial professional will explain the various strategies available, the risks of each, and aid you in completing the paper work necessary to retain ACMC which includes your selection of strategies, and the percentage of each, for your portfolio. All strategies are monitored daily, and if necessary, appropriate trades are executed to meet the objectives of each respective strategy. The strategies and the percentage of each to be used in your portfolio are contained within our Investment Management Agreement which you would have executed upon retaining ACMC. Our agreement is available on our web site at www.atlascapitalmanagement.com. Descriptions of all strategies may be found on our web site and in our Form ADV Part 2A in Item 8, available online at www.atlascapitalmanagement.com. The vast majority of our accounts are managed on a discretionary basis which means we don't need to call you when buying or selling in your account. The investment management agreement you executed gives us this authority. This agreement will remain in place until you or we terminate the relationship.

Financial Consulting: Our financial consulting service in on an as-needed basis. Advice regarding your account could be as a result of our review or your request for advice. All decisions regarding the purchase or sale on any investment within these accounts is completely yours. Additional information on our investment management services may be found in Item 4 of Form ADV Part 2A, available online at www.atlascapitalmanagement.com.

Questions to ask us:

- ***Given my financial situation, should I choose an investment management service? Why or Why not?***
- ***How will you choose investments to recommend to me?***
- ***What is your relevant experience, including your licenses, education and other qualifications? What do those qualifications mean?***

What fees and costs will I pay?

Our fee is based on the market value of your account on the last day of the quarter/month (additions and withdrawals are pro-rated), or the average daily balance of your account during the quarter/month. The management fee is charged either monthly or quarterly, depending upon the custodian of your account. Our annual standard fee schedule is as follows: 2.00% for the first $250,000, 1.75% for the next $250,000, 1.5% for the next $500,000, and 1.0% in excess of $1,000,000. Accounts residing in the same household are combined in value for fee computation. In certain instances, the fee may be negotiable at the discretion of the president of ACMC. The broker-dealer/custodian that holds your assets may charge you a custody fee, this fee is in addition to our management fee. Some investments, such as mutual funds, annuities and exchange traded funds charge internal management fees. You are responsible for all transaction and brokerage fees that may occur. You will pay fees whether you make money or lose money on your investments. ***Fees and costs will reduce any amount of money you make on your investments over time.*** It is important that you understand what fees and costs you are paying. Additional information about our fees and compensation is located in Item 5 of our Firm Brochure which is immediately available online at www.atlascapitalmanagement.com.

Atlas Capital Management Corp. 11130 Coldwater Road, Suite 104 Fort Wayne, IN 46845 Phone: (260) 637-2857 Fax: (260) 637-9707

Questions to ask us:

- ***Help me understand how these fees and costs will affect my investments. If I give you $10,000 to invest, how much will go to fees and costs and how much will be invested for me?***
- ***How do you determine what fee will be charged?***

What are your legal obligations to me when acting as my investment adviser? How does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have a fiduciary obligation, by law, to place the interest of our clients ahead of our own and the firm. We charge an investment management fee based on the assets we manage. ***We may therefore have an incentive to recommend adding assets to an account that we manage thus increasing the fee you pay us.*** Atlas offers proprietary strategies built with its trade signals and strategies created using trade signals from independent signal providers. ***This creates a financial incentive to recommend its own strategies because it does not pay a portion of the management fee to signal provider when recommending a proprietary strategy. Atlas attempts to mitigate any conflicts of interest to the best of its ability by acting in the client's best interest through its fiduciary duty.*** The firm's revenue is derived from the management fees we collect from your accounts each month or quarter (depending on the custodian). ACMC provides investment management services to clients who are introduced to the firm through the client's primary investment professional. A portion of the management fee may be shared with the referring firm. This payment will not cause you to pay additional money in management fees as this payment will come directly from ACMC's portion of management fees. Our associates may recommend other products that pay commissions, such as life insurance. ACMC does not share in these commissions.

Questions to ask us:

- ***How might your conflicts of interest affect me, and how will you address them?***
- ***How do your financial professionals make money?***

Our firm's owner is compensated on a salaried basis and receives occasional distributions of the firm's profits. Our associates are compensated by salary and bonus. Investment Advisory Representatives of our firm share in the investment management fees paid by our clients. You can find more detailed information about our conflicts of interest in Items 10 and 14 of our Firm Brochure.

Do you or your financial professionals have legal or disciplinary history?

Yes.

Questions to ask us:

- ***As a financial professional, do you have any disciplinary history?***
- ***For what type of conduct?***

Additional Information

You can find additional information about our firm's investment management services on the SEC's website at www.adviserinfo.sec.gov by searching CRD# 106107. You may also contact our firm at (260) 637-2857 and talk to one of our investment professionals or support staff.

Questions to ask us:

- ***Who is my primary contact person?***
- ***Is he or she a representative of an investment adviser or a broker-dealer?***
- ***Who can I talk to if I have concerns about how this person is treating me?***

As a client, if you have been referred to ACMC via an investment professional of an unaffiliated broker-dealer or other Registered Investment Advisor, this investment professional is your primary contact. In the event they are not available or you become unhappy with their service, you may contact ACMC directly and speak with one of our investment professionals.

Investment Management Agreement

This investment management agreement, made this _____day of_____, 20_____between

the undersigned party_____and_____,

whose mailing address is:_____

City:_____ State:_____ Zip Code:_____ (hereinafter referred to as "I," "Me," or the "Client") (individual references should be replaced with "We" or "Us"), and ATLAS CAPITAL MANAGEMENT CORP., a Registered Investment Adviser, whose principal mailing address is 11130 Coldwater Road, Suite 104, Fort Wayne, Indiana 46845 (hereinafter referred to as the "Adviser").

1. SCOPE OF ENGAGEMENT

I hereby appoint Adviser to manage the assets designated by me in one or more of the Adviser's actively managed strategies on a discretionary basis (my assets are referred to as the "Assets" or my "Account"). Unless the Client and/or the Client's Financial Services Professional has notified the Adviser to the contrary, in writing signed by the Client, there are no restrictions that the Client has imposed upon the Adviser with the respect to management of the Assets. The Adviser shall primarily allocate the Assets among various individual open end mutual funds, exchange traded funds, and/or investment subaccounts within a variable investment product owned by the client in accordance with one or more of Adviser's investment strategy(ies)/program(s) (the "Program(s)"). As referred to in this Agreement, the Client's Financial Services Professional is the Client's primary investment professional who has introduced the Client to the Adviser. Unless the Adviser has expressly agreed, in writing, to the contrary, the Client's Financial Services Professional is responsible for assisting the Client with determining initial and ongoing suitability for the investment strategies that comprise the Program(s). The Adviser's obligation shall be to manage the Account consistent with the designated investment strategy(ies)/program(s) until Adviser is notified, in writing, as to a requested change**. See paragraph 3 and 24 below.**

2. THE PROGRAM

At the opening of the Account, the Client's Financial Services Professional (or a representative of Adviser- **IF** Adviser has expressly agreed to such obligation, in writing) is required to obtain from the Client information sufficient to determine the Client's financial situation and investment objectives. The Account is managed on the basis of the Client's financial situation and investment objectives. At least quarterly, the Adviser shall contact the Client electronically, through the U.S. mail, or through the use of a custodial statement, to notify the Adviser, in writing, if the Client's financial situation or investment objectives have changed, and/or if the Client desires to impose or modify any reasonable restrictions on the management of the Account. The Adviser shall remain available by phone at (260) 637-2857 or in person at the Adviser's offices at the above Fort Wayne, Indiana address if the Client desires to consult with the Adviser regarding issues pertaining to the Account. The Client's Financial Services Professional shall also remain available by phone or in their office to consult with the Client regarding the status of the Account and its investments, or to advise if the Client's financial situation or investment objectives have changed, and/or if the Client desires to impose or modify any reasonable restrictions on the management of the Account. The Client will be provided with a quarterly statement of the Account by the Custodian. Any restriction imposed by the Client (either sent by the Client directly to the Adviser or by the Client's Financial Services Professional upon notice from the Client) must be provided to the Adviser through written notice delivered (and signed by the Client) in person, or sent via U.S. Mail or faxed at (260) 637-9707. The Client or the Client's Financial Services Professional is then responsible for confirming the Adviser's receipt of any mail or fax delivered.

3. CONFLICTS AND WAIVERS

If applicable, the Client's Financial Services Professional's firm (and its representatives) have agreed to refer clients to Adviser and will assist the Client in establishing an account. Client authorizes the Adviser to share information including, but not limited to, financial information, investment accounts, and performance information, with the Financial Services Professional, persons designated by the Financial Services Professional, Adviser's Introducing Agents, and/or the Financial Services Professional's Broker/Dealer or Registered Investment Advisory Firm. Client may elect to have Adviser not share such information by providing notice to the Adviser, in writing, that their information is not to be shared. Client is responsible for confirming the Adviser's receipt. Client authorizes Adviser to respond to inquiries from, and communicate and share information with, Client's attorney, accountant and other professionals (provided adviser has been provided written authorization from the Client) to the extent necessary in furtherance of Adviser's services under this Agreement. Client acknowledges and understands that the services to be provided by Adviser under this Agreement are limited to the management of the Assets and does not include financial planning or any other related or unrelated services. Open-end Mutual Funds may be purchased for Client that has no initial expense**. Adviser may purchase funds that impose short-term redemption fees; however, when such funds are purchased, it is the practice of the Adviser to hold these funds until the short-term fees are not applicable.** Client is advised that if Client terminates this agreement or requests full or partial liquidation of their assets, a client may incur early redemption fees. Adviser does not share in any redemption fees that are imposed by any Fund or Custodian.

4. NON-MANAGED ASSETS

Clients may have positions in assets that they do not wish to be subject to Atlas' Investment Management Agreement, but would like to be held in the same account as their managed assets. These assets are subject to the custodian's custody fee, but are not included when computing Atlas Capital's investment management fees. Clients are required to acknowledge, in writing, that Atlas Capital has no discretion regarding these assets and no responsibility to monitor or advise clients on these assets. Any action that a client requests regarding these assets must be provided to Adviser in writing and are subject to usual custodial fees/costs.

5. ADVISER COMPENSATION AND EXPENSES

The Client automatically engages the Adviser on a percentage (%) of the market value of the Assets under management. (a) The Adviser's annual fee for investment management services provided under this Agreement shall be based upon a percentage (%) of the market value of the Assets under management in accordance with the following fee schedule:

First	…	$250,000	…	2.00%
Next	…	$250,000	…	1.75%
Next	…	$500,000	…	1.50%
Thereafter	……			1.00%

This annual fee shall be prorated (giving credit for account contributions, withdrawals, and the number of days in the quarter that the Account was under Adviser's management) and paid quarterly, in arrears, based upon the market value of the Assets on the last day of the previous quarter. With the billing period beginning October 1, 2020, Atlas will begin using average daily balance to calculate advisory fees at E*TRADE Advisor Services and any other custodian where average daily balances are available. Beginning October 1, 2020, and going forward, investment advisor fees will be calculated and billed monthly, using average daily balances, replacing quarterly billing. This replaces calculations using end of quarter balances with all deposits and withdrawals prorated for actual time invested. All other custodians where average daily balances are not available, investment management fees will use end of month values, with deposits and withdrawals prorated. No increase in the annual fee shall be effective without prior written notification to the Client; (b) Unless the Client otherwise indicates in the Adviser Compensation Information Section of this Agreement, the Client authorizes the Custodian of the Assets to charge the Account for the amount of the Adviser's fee and to remit such fee to the Adviser consistent with regulatory procedures; (c) In addition to Adviser's annual investment management fee, the Client shall also incur, relative to all mutual fund, exchange traded fund and/or variable investment products, charges imposed directly at the mutual fund , exchange traded fund and/or variable investment product level (e.g. advisory fees and other fund expenses); (d) No portion of Adviser Compensation shall be based on capital gains or capital appreciation of the Assets except as provided for under the Investment Advisers Act of 1940.

6. CUSTODIAN

The Assets shall be held by an independent Custodian (i.e., clearing firm, trust company, mutual fund company, bank, Broker/Dealer, or the variable investment product sponsor), not the Adviser. The Adviser is authorized to give instructions to the Custodian with respect to all investment decisions regarding the Client's assets and the Custodian is hereby authorized to effect transactions, deliver securities, and otherwise take such actions, as needed, in connection with the performance of the Adviser's obligations under this Agreement.

7. RISK ACKNOWLEDGEMENT

I acknowledge the Adviser does not guarantee the future performance of the Account. I understand that investment recommendations for the Account may not always be profitable. I further acknowledge that past performance may not be indicative of future results, and that future performance of any specific investment or investment strategy may not be profitable or equal to any historical performance level(s). I accept that the Programs are intended to be long-term investments (i.e. at least 5 years), and, I agree that a fair assessment of Account performance cannot be made on a short-term basis.

8. RISK DISCLOSURE INFORMATION FOR STRATEGIES THAT MAY USE LEVERAGED, INVERSE, GOLD, SILVER, PRECIOUS METALS OR OIL AS INVESTMENT OPTIONS

It is the recommendation of Atlas Capital for client's to limit their investing to no more than 50% of their investable net worth in the strategies that use any of the above options. Clients are advised that this is a recommendation only and Atlas Capital does not restrict, monitor or supervise in any way the amount of investments that a client selects in the above strategies as long as it is consistent with their stated investment objectives, risk tolerance, time horizon, and investment experience and knowledge. If you have selected one or more investment strategies that use leveraged, inverse, precious metals, gold, silver, or oil mutual funds or exchange-traded funds (ETFs) as investment options, please read carefully the descriptions and potential risks of using these investment options as these strategies may not be suitable for all investors. Leveraged mutual funds and ETFs seek to deliver multiples of the performance of the index or benchmark they track. Some leveraged mutual funds and ETFs are "inverse" or "short" funds, meaning that they seek to deliver the opposite of the performance of the index or benchmark they track. Like some traditional mutual funds or ETFs, some inverse funds or ETFs track broad indices, some are sector-specific, and still others are linked to commodities or currencies. Inverse funds and ETFs are designed as a way for investors to profit from, or at least hedge their exposure to, downward moving markets. Indexes are unmanaged and cannot be invested in directly. Performance of any index does not represent the actual performance of any particular investor(s). Index performance does not reflect any management fees, transaction costs, brokerage commissions, or other expenses that would be incurred and that would reduce returns. Some mutual funds are both leveraged and inverse, meaning

that they seek to achieve a return that is a multiple of the inverse performance of the underlying index. An inverse ETF or fund that tracks the S&P 500, for example, seeks to deliver the inverse of the performance of the S&P 500, while a 2x leveraged inverse S&P 500 ETF seeks to deliver twice the opposite of that index's performance. Leveraged ETFs and mutual funds entail certain risks, including risk associated with the use of derivatives (swap agreements, future contracts and similar instruments), imperfect benchmark correlation, leverage and market price variance, all of which can increase volatility and decrease performance. In addition, there is no guarantee that the mutual funds or ETFs will be able to meet their objective as it relates to the index or benchmark that it is designed to track. Leveraged and inverse mutual funds are also subject to active investor risk as there are no restrictions on the size and frequency of trades and transaction fees. The frequent exchanges permitted by most leveraged mutual funds can decrease performance, increase expenses and cause investors to incur tax consequences. Leveraged and inverse mutual funds usually have above average internal fees which has the potential of reducing performance. ETFs usually have lower internal expenses than mutual funds; however, the buying and selling of ETFs incur trading expenses which have the effect of reducing gains or increasing losses. Most leveraged mutual funds and ETFs "reset" daily, meaning that they are designed to achieve their stated objectives on a daily basis, while some are designed to achieve their stated objectives on a monthly basis. Due to the effect of compounding, their performance over longer periods of time can differ significantly from the performance (or inverse of the performance) of their underlying index or benchmark during the same period of time. According to release 09-31 from the Financial Industry Regulatory Authority (FINRA), the following are examples of how a leveraged fund can deviate from intended objective. For example, between December 1, 2008, and April 30, 2009:

- The Dow Jones U.S. Oil & Gas Index gained 2 percent, while an ETF seeking to deliver twice (2x) the index's daily return fell 6 percent and the related ETF seeking to deliver twice the inverse (-2x) of the index's daily return fell 26 percent.
- An ETF seeking to deliver three times (3x) the daily return of the Russell 1000 Financial Services Index fell 53 percent while the index actually gained around 8 percent. The related ETF seeking to deliver three times (3x) the inverse of the index's daily return actually declined by 90 percent over the same period. Atlas Capital Strategies discussed herein may use investment options that are leveraged or unleveraged, inverse or inverse leveraged. Please refer to each strategies information disclosure for additional information.

This effect can be magnified in volatile markets. Using a two-day example, if the index goes from 100 to close at 101 on the first day and back down to close at 100 on the next day, the two-day return of an inverse ETF will be different than if the index had moved up to close at 110 the first day but then back down to close at 100 on the next day. In the first case with low volatility, the inverse ETF loses 0.02 percent; however, in the more volatile scenario the inverse ETF loses 1.82 percent. The effects of mathematical compounding can grow significantly over time, leading to scenarios such as those noted above. The Atlas strategies that use leveraged investment options generally have very short holding periods and attempt to minimize the risks illustrated above. These holding periods may be as short as one day and seldom longer than thirty days. The precious metals, gold, silver, oil, and government bond investment options are not considered diversified options as all of their investments are concentrated in the precious metals sector, government bond, or the oil sector. Because of the concentration of investments in these strategies, these strategies should be considered to have above average risk and may have greater volatility and drawdowns than other Atlas Capital Management strategies. Past performance may not be indicative of future results. Therefore, no current or prospective client should assume that future performance will be profitable. It should be noted that the possibility of loss exists along with the potential for profit. Different types of investments involve varying degrees of risk. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and investment strategies of Atlas Capital Management) will be profitable.

9. BIBLICALLY RESPONSIBLE INVESTING (BRI) INFORMATION, LIMITATIONS AND SHARING PROGRAM

Certain clients desire to invest all, or a portion, of their investment portfolio in biblically responsible securities (i.e. companies whose businesses do not involve production or sale of such products as alcohol, tobacco, firearms, contraceptives, etc.). The number of such companies are limited (including mutual funds and exchange traded funds that limit investment to such securities) when compared to the broad market of publically traded companies and funds. As such, the diversification of the client's portfolio will correspondingly be adversely effected, as well as potential for portfolio underperformance. A client that desires such strategy must accept the above limitations. The most compelling reason to invest in BRI strategies is to reflect an investor's moral values. Atlas offers clients the option of participating in Atlas Capital Management's "Sharing Program". Applicable only to the BRI Strategies, this program allows clients to designate 10% of Atlas's net advisory fees (after payment made to servicing adviser and any other parties) collected on the portion of their account invested in any or all of the BRI strategies to one church or religious institution of their choice. The sharing program will not cause the underlying client to pay additional money or higher fees to compensate Atlas for the portion of its advisory paid to the designated organization. In order to qualify for the Atlas Capital Management Sharing Program, a client must be invested in one or more BRI strategies at the end of the calendar year. Fees will be determined by using the appropriate fee schedule, market value of the BRI strategies held in the client's account and length of time invested in the BRI strategies (see Section 5 Adviser Compensation and Expenses for more details). To participate in the sharing plan a client must submit the Atlas Sharing Program Designation Form. Payment to the designated institution occurs annually, in arrears, on or about January 31st of the subsequent calendar year.

10. DIRECTIONS TO THE ADVISER

All directions, instructions, notifications to the Client's investment objective shall be made in writing and signed by the Client, and provided to the Adviser by the Client or by the Client's Financial Services Professional as set forth in Section 2 of agreement. The Adviser shall be fully protected in relying upon any direction, notice, or instruction until it has been duly advised by Client or Client's Financial Services Professional, in writing, of changes.

11. ADVISER LIABILITY

The Adviser, acting in good faith, shall not be liable for any action, omission, investment recommendation/decision, or loss in connection with this Agreement including, but not limited to, the investment of the Assets, or the acts and/or omissions of other professionals or third party service providers recommended to the Client by the Adviser, including a broker-dealer and/or custodian, attorney, accountant, insurance agent, or any other professional. If the Account contains only a portion of the Client's total assets, Adviser shall only be responsible for those assets that the Client has designated to be the subject of the Adviser's investment management services under this Agreement without consideration to those additional assets not so designated by the Client. If, during the term of this Agreement, the Adviser purchases specific individual securities for the Account at the direction of the Client (i.e. the request to purchase was initiated solely by the Client), the Client acknowledges that the Adviser shall do so as an accommodation only, and that the Client shall maintain exclusive ongoing responsibility for monitoring any and all such individual securities, and the disposition thereof. Correspondingly, the Client further acknowledges and agrees that the Adviser shall not have any responsibility for the performance of any and all such securities. Client acknowledges that any request to purchase or hold any security(ies) not being managed by Adviser requires additional paperwork and these requests will not be acted upon by Adviser until such paperwork is signed and on file with the Adviser. In addition, with respect to any and all accounts maintained by the Client with other investment professionals or at custodians for whom the Adviser does not maintain trading authority, the Client, and not the Adviser, shall be exclusively responsible for the investment performance of any such assets or accounts. In the event the Client desires that the Adviser provide investment management services with respect to any such assets or accounts, the Client may engage the Adviser to do so for a separate and additional fee. The Client acknowledges that investments have varying degrees of financial risk, and that Adviser shall not be responsible for any adverse financial consequences to the Account resulting from any investment that, at the time made, was consistent with the investment strategy designated by the Client. The Client further acknowledges and agrees that Adviser shall not be responsible for any financial consequences occurring during or in furtherance of the Account transition process (i.e., the transfer of the Assets from the Client's predecessor advisors/custodians to the Accounts to be managed by the Adviser) resulting from: (1) securities purchased by Client's predecessor advisor(s); (2) the sale by Adviser of securities purchased by the Client's predecessor advisor(s) subsequent to completion of the Account transition process; and (3) any account transfer, closing or administrative charges or fees imposed by the previous broker-dealer/custodian. The federal securities laws impose liabilities under certain circumstances on persons who act in good faith, and therefore nothing herein shall in any way constitute a waiver or limitation of any rights which the Client may have under any federal or state securities laws.

12. VARIABLE ANNUITY AND VARIABLE UNIVERSAL LIFE CONTRACT ACKNOWLEDGEMENTS

Adviser is considered a "third party adviser/manager" by insurance companies that issue Variable Annuity (VA) or Variable Universal Life (VUL) contracts. Some companies may from time-to-time or continuously restrict Adviser from selecting certain investment options or limit the amount of assets the Adviser may place in certain investment options on behalf of their Clients. These restrictions may not apply to contract owners who do not use Adviser. Adviser has no control or ability to change any of these limitations that may be placed on Adviser by the respective insurance companies. Client acknowledges that if certain "riders" and or "benefits" are selected by Client for their VA or VUL contract, there may be limitations on the amount of Client's assets that may be placed in any one individual investment option or group of options. These limitations generally apply whether or not the contract is being managed by Adviser or Client. Client acknowledges that certain VA contracts may have a provision that the respective insurance company, at their discretion, move monies between the currently selected investment options and that of a fixed account or money market account. Client acknowledges that Adviser has no control on the timing or amount of these transfers. Fee calculations for VA's with this feature will be billed on the value of the contract that is controlled by Adviser at the end of each respective billing period. There will be no proration of monies that were moved by the respective insurance company into or out of the investment selections made by the Adviser. Client acknowledges that each VA or VUL contract has limits on the number of investment exchanges that may be made each calendar or contract year. Client acknowledges that each VA or VUL contract may contain limitations and/or restrictions on the number and frequency of exchanges that are allowed within their contract and that these limitations and/or restrictions are subject, without notice, to a third party adviser, and further that each insurance company reserves the right to impose additional restrictions without notice, even if none of the published limitations/restrictions have been violated. These additional restrictions may include, but not be limited to, temporary or permanent availability of certain investment options and/or the temporary or permanent requirement at all future investment changes be submitted only via U. S. Mail. Adviser shall use its best effort not to violate any of the published or unpublished restrictions and Client agrees to hold Adviser harmless should any violation occur and restrictions be applied to Client's contract. These restrictions may continue to be imposed even if Adviser is removed as third party advisor to their contract. In addition to limiting the number of investment changes that may be made, some companies may have minimum holding periods whenever an investment change is made. These limits are generally applicable to either Client or Adviser when making investment changes. Because of these limitations, Adviser may elect to delay making its first investment reallocation until such time as other contract holders, within the same insurance company, are reallocated. Client acknowledges that if they elect to have Adviser's fees deducted from Client's VA or VUL contract, there could be adverse tax consequences and/or withdrawal penalties imposed by the respective insurance companies. In addition, fee deductions could have a negative effect on "riders or benefits" selected by client. Some insurance companies issuing VUL's may elect to treat fee deductions as loans against the policy. This could have the effect of interest being charged on the loan and also causing a reduction in the death benefit. Clients are advised to consult a tax professional for advice on the deduction of fees as it pertains to Client. Client acknowledges that these restrictions/limitations contained in this section could add

or detract from the results the Adviser might have achieved if such restrictions/ limitations did not exist. Client acknowledges that the insurance companies may, at their discretion, modify the list of available investment selections within the respective VA or VUL. Such modifications may have the effect of adding or detracting from the results the Adviser might have achieved if such modifications had not occurred. Adviser has no control over these modifications. Client acknowledges that certain investment strategies offered by the Adviser may not be available to be implemented within every VA or VUL due to the restrictions or limitations by the respective VA or VUL, or that the Client's VA or VUL does not contain investment selections that Adviser believes necessary to implement every strategy. Client is advised to confirm with the Adviser the availability of preferred strategy with the Client's VA or VUL contract. Should Client have any questions, the Adviser remains available to address any questions that the Client may have regarding the above.

13. PROXIES

Adviser shall have no obligation or authority to take any action or render any advice with respect to the voting of proxies solicited by or with respect to issuers of securities held by an Account. The Client (or plan fiduciary in the case of an Account subject to the provisions of the ERISA) expressly retains the authority and responsibility for, and Adviser is expressly precluded from rendering any advice or taking any action with respect to the voting of any such proxies. The Client shall be responsible for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the Client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type of events pertaining to the assets. Adviser is authorized to instruct the Custodian to forward to the Client copies of all proxies and shareholder communications relating to the Assets.

14. REPORTS

The Account Custodian shall provide the Client with periodic reports for the Account at least quarterly.

15. ASSIGNMENT

This Agreement may not be assigned (within the meaning of the Investment Advisers Act of 1940) by either Client or the Adviser without the prior consent of the other party. The Client acknowledges and agrees that transactions that do not result in a change of actual control or management of Adviser shall not be considered an assignment pursuant to Rule 202(a)(1)-1 under the Investment Advisers Act of 1940. Should there be a pending change in control of the Adviser that will result in an assignment of this Agreement (as that term is defined under the Advisers Act), the Client will be provided with written notice of such event. If the Client does not object to such assignment, in writing, it will be assumed that the client has consented to the assignment, and services will continue to be of this Agreement**.**

16. NON-EXCLUSIVE MANAGEMENT

Adviser, its officers, employees, and agents, may have or take the same or similar positions in specific investments for their own accounts, or for the accounts of other Clients, as the Adviser does for the Assets. Client expressly acknowledges and understands that Adviser shall be free to render investment advice to others and that Adviser does not make its investment management services available exclusively to Client. Nothing in this Agreement shall impose upon the Adviser any obligation to purchase or sell, or to recommend for purchase or sale, for the Account any security which the Adviser, its principals, affiliates or employees, may purchase or sell for their own accounts or for the account of any other Client, if in the reasonable opinion of the Adviser, such investment would be unsuitable for the Account or if the Adviser determines in the best interest of the Account it would be impractical or undesirable.

17. DEATH OR DISABILITY

The death, disability or incompetency of Client will not terminate or change the terms of this Agreement. However, Client's executor, guardian, attorney-in-fact or other authorized representative may terminate this Agreement by giving written notice to Adviser, and providing corresponding evidence of such appointment or position. The Client recognizes that the Custodian may not permit any further Account transactions until such time as corresponding documentation is provided to the Custodian.

18. ARBITRATION

To the extent that the parties do not agree to initially submit the dispute to non-binding mediation, subject to the conditions and exceptions noted below, and to the extent not inconsistent with applicable law, in the event of any dispute pertaining to Adviser's services under this Agreement, both Adviser and Client agree to submit the dispute to arbitration in accordance with the auspices and rules of the American Arbitration Association ("AAA"), provided that the AAA accepts jurisdiction. Adviser and Client understand that such arbitration shall be final and binding, and that by agreeing to arbitration, both Adviser and Client are waiving their respective rights to seek remedies in court, including the right to a jury trial. The venue (i.e. location) for the resolution of any dispute shall be County of Allen, State of Indiana. Client acknowledges that he/she/it has had a reasonable opportunity to review and consider this arbitration provision prior to the execution of this Agreement. Client acknowledges and agrees that in the specific event of non-payment of any portion of Adviser Compensation pursuant to this section or an administrative fee pursuant to paragraph 30 of this Agreement, Adviser, in addition to the aforementioned arbitration remedy, shall be free to pursue all other legal remedies available to it under law, and shall be entitled to reimbursement of reasonable attorney's fees and other costs of collection. The venue (i.e. location) for the resolution of non-payment of any portion of Adviser's compensation or Administrative fees shall be the county of Allen, State of Indiana.

19. DISCLOSURE STATEMENT

The Client hereby acknowledges receipt of a copy of the Adviser's Form CRS/Form ADV Part 3 (Client Relationship Summary) and written Disclosure Statement as set forth on Part 2A of Form ADV. The Disclosure Statement discusses the scope of the Adviser's services, fees, and any corresponding conflicts of interest.

20. ELECTRONIC DELIVERY

The Client authorizes the Adviser to deliver, and the Client agrees to accept, all required regulatory notices and disclosures via electronic mail and/or via the Adviser's internet web site, as well as all other correspondence from the Adviser. Adviser shall have completed all delivery requirements upon the forwarding of such document, disclosure, notice and/or correspondence to the Client's last provided email address (or upon advising the Client via email that such document is available on the Adviser's web site). **Please Note**: It is the Client's obligation to notify the Adviser, in writing, of any changes to the Client's email address. Until so notified, the Adviser shall rely on the last provided email address. The Client acknowledges that the Client has the ongoing ability to receive and open standard electronic mail and corresponding electronic documents. If, at any time, the Client's electronic delivery situation changes, or the Client is unable to open a specific document, the Client agrees to immediately notify the Adviser so that the specific issue can be addressed and resolved. **Please Also Note**: By execution below, the Client releases and holds the Adviser harmless from any and all claims and/or damages of whatever kind resulting from the Adviser's electronic transmission of information, provided that Adviser has correctly addressed the electronic transmission to the Client and/or other intended recipient.

21. TRADE ERRORS

All Account trades are placed electronically, telephonically or via telefax by Adviser. Adviser assumes responsibility for any Account losses for trading errors directly resulting from Adviser's failure to follow Adviser's trading procedures or from a lapse in Adviser's internal communications. In such instances, the Account(s) will be compensated for any such corresponding losses. However, the Client acknowledges that Adviser cannot and will not be responsible for Account errors and/or losses that occur where Adviser has used its best efforts (without direct failure on the part of Adviser) to execute trades in a timely and efficient manner. If a trade or some portion of a trade is not effected or an electronic "glitch" occurs which results in the Account not being traded at the same time or at the same price as others, and such occurrence is not a result of Adviser's failure to execute or follow its trade procedures, the resulting loss will not be considered a trading error for which Adviser is responsible. In addition, virtually all mutual funds, as disclosed in their prospectuses, reserve the right to refuse to execute trades if, in a fund's sole judgment, the trade(s) would jeopardize the value of the fund. Adviser has no authority to change, alter, amend, or negotiate any provision set forth in a mutual fund prospectus. The Client further acknowledges that Adviser cannot and will not be responsible for trades that are not properly executed by any clearing firm, custodian, mutual fund, or insurance company, when an order has been properly submitted by the Adviser. Finally, Adviser cannot be responsible for a unilateral adverse decision by a mutual fund or insurance company to restrict and/or prohibit mutual fund asset management programs.

22. ADVISER'S PROPRIETARY TEST

The Client acknowledges that the Adviser's Programs are proprietary, and the Client shall not share any information regarding the programs, including but not limited to trade signals, investment algorithms, or Account composition, with any non-Client of Adviser.

23. SEVERABILITY

Any term or provision of this Agreement which is invalid or unenforceable in any jurisdiction shall, as to such jurisdiction, be ineffective to the extent of such invalidity or unenforceability without rendering invalid or unenforceable the remaining terms or provisions of this Agreement or affecting the validity or enforceability of any of the terms or provisions of this Agreement in any other jurisdiction.

24. CLIENT CONFLICTS

If this Agreement is between Adviser and related clients (i.e. spouse, life partners, etc.), Adviser's services shall be based upon the joint goals communicated to the Adviser. Adviser shall be permitted to rely upon instructions from either party with respect to the Assets that are jointly owned**,** unless and until such reliance is revoked in writing to Adviser. Adviser shall not be responsible for any claims or damages resulting from such reliance or from any change in the status of the relationship between the clients.

25. REFERRAL FEES

I accept that the Adviser will pay a referral fee in accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940. The referral fee is paid solely from Adviser Compensation, and will not result in any additional charge to the Client. The Client acknowledges receipt of the written disclosure statement disclosing the terms of the solicitation arrangement between the Adviser and the Client's Financial Services Professional, including the compensation to be received from the Adviser by the broker-dealer and/or investment adviser with whom the Financial Services Professional is associated. I understand and agree that the Financial Services Professional shall at all times be exclusively responsible for: (1) assisting the Client in determining the initial and ongoing suitability for Adviser's investment portfolios and/or strategies, and ongoing communications with the Client; and (2) for receiving/ascertaining the Client's directions, notices, and instructions, and for forwarding same to Adviser, in writing. Correspondingly, Client acknowledges that he/she/they/it shall be responsible for communicating any such directions or instruction directly to the Adviser and/or Client's Financial Services Professional as provided above. Adviser shall be entitled to rely upon such direction, notice or instruction (including any information or documentation regarding Client's investment objectives, risk tolerances, and/or investment restrictions) until Adviser has been duly advised in writing of changes therein. Adviser shall have no responsibility to the Client for failure to timely receive / ascertain/ forward / communicate any and all such directions, notices, and instructions. Both the Client and the Client's Financial Services Professional shall hold Adviser harmless if Adviser has acted in reliance upon any information, documentation, direction, notice or instruction referenced above. In the event the Client's Financial Services Professional is terminated or resigns from his/her current investment advisory firm or broker-dealer while this Agreement is in effect, he or she (or the investment advisory firm or broker-dealer firm with which he or she is associated) shall generally remain entitled to receive a referral fee for as long as this Agreement remains in effect (unless the

agreement between the Adviser and the Client's Financial Services Professional and/or the investment advisory firm or broker-dealer firm with which he or she is associated, provides differently).

26. PRIVACY POLICY

The Adviser maintains physical, electronic, and procedural safeguards that comply with federal standards to protect its Clients' nonpublic personal information ("information"). Through this policy and its underlying procedures, Adviser attempts to secure the confidentiality of customer records and information and protect against anticipated threats or hazards to the security or integrity of customer records and information. It is the policy of Adviser to restrict access to all current and former Clients' information (i.e., information and records pertaining to personal background, investment objectives, financial situation, tax information/returns, investment holdings, account numbers, account balances, etc.) to those employees and affiliated/nonaffiliated entities who need to know that information in order to provide products or services to the Client. Adviser may disclose the Client's information if Adviser is: (1) previously authorized to disclose the information to individuals and/or entities not affiliated with Adviser including, but not limited to the Client's other professional advisors and/or service providers (i.e., attorney, accountant, insurance agent, broker-dealer, investment adviser, account custodian, etc.); (2) required to do so by judicial or regulatory process; or (3) otherwise permitted to do so in accordance with the parameters of applicable federal and/or state privacy regulations. The disclosure of information contained in any document completed by the Client for processing and/or transmittal by Adviser in order to facilitate the commencement/ continuation/termination of a business relationship between the Client and a non-affiliated third party service provider (i.e., broker-dealer, investment adviser, account custodian, insurance company, etc.), including information contained in any document completed and/or executed by the Client for Adviser (i.e., advisory/management agreement, Client information form, etc.), shall be deemed as having been automatically authorized by the Client with respect to the corresponding nonaffiliated third party service provider. Adviser permits only authorized employees and affiliates who have signed a copy of Adviser Privacy Policy to have access to Client information. Employees violating Adviser's Privacy Policy will be subject to Adviser's disciplinary process. Additionally, whenever Adviser hires other organizations to provide services to Adviser's Clients, Adviser will require them to sign confidentiality agreements and/or the Privacy Policy.

27. CONVERSATIONS WITH ADVISER

Client acknowledges and agrees (i.e. gives his/her permission) that Adviser may, at Adviser's discretion, electronically record any telephone conversation to or from the Client without any further notification or approval from the Client.

28. FORCE MAJEURE

Adviser shall not be liable for loss or delay caused directly or indirectly by war, natural disasters, government restrictions, exchange or market rulings, acts of terrorism or other conditions beyond Adviser's control.

29. AMENDMENTS

The Adviser (via U.S. mail or electronic mail to the Client) may amend this Agreement upon notice to the Client, which amendment, unless the Client notifies the Adviser to the contrary in writing (via U.S. mail), shall become effective thirty (30) days from the date of mailing/ notification.

30. APPLICABLE LAW

This Agreement supersedes and replaces, in its entirety, all previous investment advisory/management agreement(s) between the parties. To the extent not inconsistent with applicable law, this Agreement shall be governed by and construed in accordance with the laws of the State of Indiana. In addition, to the extent not inconsistent with applicable law, the venue (i.e. location) for the resolution of any dispute or controversy between Adviser and Client shall be the County of Allen, State of Indiana.

31. AUTHORITY

I have all requisite legal authority to execute this Agreement, and that there are no encumbrances on the Assets. I agree to immediately notify the Adviser, in writing, in the event that either of these representations should change.

32. TERMINATION

This Agreement will continue in effect until terminated by either party by **WRITTEN NOTICE** to the other (electronic mail will not suffice). Telefax may be accepted at the sole discretion of the Adviser. **PLEASE NOTE:** It is recommended that the Client contact Adviser directly to confirm receipt of telefax as Adviser shall not be responsible for faxes not received. Written notice must be signed by the terminating party(ies). Termination of this Agreement will not affect (i) the validity of any action previously taken by Adviser under this Agreement; (ii) liabilities or obligations of the parties from transactions initiated before termination of this Agreement; or (iii) Client's obligation to pay management fees (prorated through the date that Adviser receives and accepts a written termination notice from the Client, unless the termination date is a mutually agreed upon date subsequent to the Adviser's receipt of the written termination notice). Upon the termination of this Agreement, Adviser will have no obligation to recommend or take any action with regard to the securities, cash or other investments in the Account. In the event that the Client terminates this agreement or withdraws any portion of the Account without prior or simultaneous notification to the Adviser, the Client acknowledges and agrees that the Account shall incur, in addition to and together with the quarterly investment management fee due to the Adviser, an administrative fee of .5% of the withdrawn amount (subject to a minimum administrative fee of $250.00). Client(s) submission of account transfer instructions, Client(s) removal of Adviser from management of their account at the custodian, or requests from Client(s) to close their account(s) that are presented to Custodian does NOT constitute notification to Adviser.

33. **ACCOUNT TRANSFERS**

The Client acknowledges that any written request made to the Adviser to assist in the transfer of funds from the Account will not be acted upon by the Adviser until the Adviser has first confirmed the authenticity of the request with the Client.

34. ERISA / IRC FIDUCIARY ACKNOWLEDGEMENT

The Adviser acknowledges if the client is: (i) a retirement plan ("Plan") organized under the Employee Retirement Income Security Act of 1974 ("ERISA"); (ii) a participant or beneficiary of a Plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code, with authority to direct the investment of assets in his or her Plan account or to take a distribution; (iii) the beneficial owner of an Individual Retirement Account ("IRA") acting on behalf of the IRA; or (iv) a Retail Fiduciary with respect to a plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code: then Adviser represents that it and its representatives are fiduciaries under ERISA or the Internal Revenue Code, or both, with respect to any investment advice provided by Adviser or its representatives or with respect to any investment recommendations regarding an ERISA Plan or participant or beneficiary account.

35. REBALANCE

The Adviser may, at its discretion, rebalance the strategies in a client's account to reflect the client's most recent elections on the Management Strategy Selection Form.

36. UNITED STATES PERSON

I acknowledge that I am a United States Person. The term "person" means an individual, a corporation, a partnership, an association, a trust, or any unincorporated organization that resides in the United States (regardless of citizenship).

37. PART 2A OF FORM ADV ACKNOWLEDGMENT

The Client acknowledges receipt of a copy of Adviser's Form CRS/Form ADV Part 3 (Client Relationship Summary) and Part 2A of Advisers Form ADV as filed with the Securities and Exchange Commission prior to the execution of this agreement

PLEASE NOTE: PRIOR TO EXECUTION. **THE ADVISER REMAINS AVAILABLE TO ADDRESS ANY QUESTIONS THAT THE CLIENT MAY HAVE REGARDING ANY PORTION OF THE ABOVE PRIOR TO EXECUTION BY THE CLIENT**.

Unless the Client otherwise indicates below the Client authorizes the Custodian of the Assets to charge the Account for the amount of the Adviser's fee and to remit such fee to the Adviser consistent with regulatory procedures.

DIRECT BILL OF MANAGEMENT FEES		
Only complete this section in the event the client has elected to be direct billed for management fees at the address of record.		
_____Owner Initial	_____Joint Owner Initial	I wish not to have management fees automatically deducted from my account(s) and to be billed at our address of record for all management fees. I agree to pay any such management fee within 30 days of the date of the invoice. In the event that same is not paid within this period, I authorize the unpaid fee to be deducted directly from my managed account(s). In the event of termination of management I authorize any unpaid management fees to be deducted directly from the account. I understand that Adviser is not responsible for any fees, tax consequences, or penalties that could be incurred.

DEDUCTION OF MANAGEMENT FEES		
Only complete this section in the event the client has elected to have management fees deducted from another account.		
_____Owner Initial	_____Joint Owner Initial	I wish to have management fees automatically deducted as follows: For fees accrued on account_____ please deduct from account_____. I understand that Atlas Capital is not responsible for any fees, tax consequences, or penalties that may be incurred. Management Fees for non-qualified accounts may not have fees deducted from qualified accounts. In the event there are insufficient funds from the account designated for fee withdrawal, I authorize the unpaid fee to be deducted directly from the managed account. I acknowledge the deduction could cause adverse tax consequences or penalties.

PERSONAL AND FINANCIAL INFORMATION

SECTION 1: ACCOUNT TYPE					
☐ INDIVIDUAL	☐ IRA	☐ ROTH IRA	☐ JOINT TENANT	☐ CUSTODIAN	☐ TRUST/OTHER

SECTION 2: INDIVIDUAL / IRA / ROTH IRA / JOINT TENANT		
First Name Choose One	MI	Last Name
Mailing Address		
City	State	ZIP code
Social Security Number	Date of Birth	Home Phone
E-mail Address_____@_____ **(Must be provided pursuant to section 20 of the Investment Management Agreement)**		
Joint First Name Choose One	MI	Last Name
Mailing Address		
City	State	ZIP code
Social Security Number	Date of Birth	Home Phone
E-mail Address_____@_____ **(Must be provided pursuant to section 20 of the Investment Management Agreement)**		

SECTION 3: CUSTODIAL ACCOUNT		
Custodian First Name Choose One	MI	Last Name
Mailing Address		
City	State	Zip Code
Social Security Number	Date of Birth	Home Phone
E-mail Address_____@_____ **(Must be provided pursuant to section 20 of the Investment Management Agreement)**		
Minors First Name	MI	Last Name
Social Security Number	Date of Birth	

SECTION 4: TRUST ACCOUNT		
Name of Trust		
Name of Trustee	Trust Date	Tax ID Number
Mailing Address		
City	State	ZIP code
E-mail Address_____@_____ **(Must be provided pursuant to section 20 of the Investment Management Agreement)**		Home Phone

SECTION 5: CORPORATION / ASSOCIATION / PARTNERSHIP		
Name		
Contact Person Choose One		Tax ID Number
Mailing Address		
City	State	ZIP code
E-mail Address_____@_____ **(Must be provided pursuant to section 20 of the Investment Management Agreement)**		Home Phone

Atlas Capital Management Corp. 11130 Coldwater Road, Suite 104 Fort Wayne, IN 46845 Phone: (260) 637-2857 Fax: (260) 637-9707

SECTION 6: GENERAL INFORMATION

Primary Account Owner Current Employer	Current Occupation
Joint Account Owner Current Employer	Current Occupation

SECTION 7: ADDITIONAL INFORMATION

Annual Income - include all sources (i.e. salary, pension, alimony, social security, income from investments and/or rental properties)

☐ $0-$24,999	☐ $25,000-$49,999	☐ $50,000-$99,999	☐ $100,000-$199,999
☐ $200,000-$499,999	☐ $500,000-$999,999	☐ $1,000,000-$1,999,999	☐ $2,000,000 and greater

Current Net Worth: Total assets minus what you owe in debts. Include value of primary residence, other real estate, business interest, land, personal property, 401k plans, bank accounts, annuities, IRA's, etc. $ ☐ Individually ☐ Jointly

Investable Net Worth: **Exclude primary residence.** Current estimated value of all cash, cash equivalents and liquid investments. For purposes of this question, include all certificate of deposits, annuities, IRA's, mutual funds, stocks, bonds, savings accounts, retirement accounts, 401k's, etc.

$ ☐ Individually ☐ Jointly

Investment Knowledge	☐ Limited		☐ Moderate		☐ Extensive	
Investment Objective	☐ Conservative		☐ Growth		☐ Aggressive	
Investment Time Horizon	☐ Short (1-5 years)		☐ Intermediate (5-10 years)		☐ Long (10 year or more)	
Investment Risk Tolerance	☐ Low		☐ Moderate		☐ High	
Investment Experience	Mutual Funds	_____years	Stocks	_____years	Bonds	_____years

Securities / Mutual Funds that should not be used by the Adviser or any other restrictions or limitations that the Adviser is to be made aware of:

SECTION 8: ACCOUNT VERIFICATION (Voluntary completion to assist in client verification)

Atlas Capital Management takes your account security very seriously, and uses security questions to provide you with a secondary method to identify yourself when contacting Atlas Capital directly. These voluntary security questions are designed to be memorable to you but hard for anyone else to guess. When used with other identifying information, they help Atlas Capital verify the person requesting access to your account. Choose one or more questions below.

1. In what city were you born?	Answer:
2. What was the color of your first car?	Answer:
3. What school did you attend for the sixth grade?	Answer:
4. What was your high school mascot?	Answer:
5. What is your father's middle name?	Answer:
6. Where were you New Year's 2000?	Answer:

SECTION 9: ACCOUNTS TO BE MANAGED

Company	Product Name	Account Number	Approximate Value	Riders
1.				
2.				
3.				
4.				
5.				
6.				

SOLICITOR ACKNOWLEDGEMENT

1. The Broker/Dealer, Account Executive or Registered Investment Advisor ("Financial Services Professional") proposes to introduce you to Atlas Capital Management Corporation, (Adviser) for the purpose of your becoming a client of that firm. 2. Except for the contractual relationship where the Financial Services Professional receives a referral fee for introducing certain clients to the Adviser, Financial Services Professional and the Adviser are not affiliated. 3. The Financial Services Professional may be affiliated with various Brokerage Firms or Broker/Dealers and may receive a commission for the client's initial purchase of a particular investment. Since the Financial Services Professional may be affiliated with a Brokerage Firm or Broker/Dealer handling a client account, there may be a potential conflict of interest. Financial Services Professional will render no investment advisory service to you on behalf of the Adviser. However, the Adviser has agreed to pay to the Financial Services Professional, or the Financial Services Professionals' Broker/Dealer, Fifty Percent (50%) of the total Management Fee (Referral Fee) for introducing you to the Adviser and for handling certain administrative functions on the Adviser's behalf. The Referral Fee shall be paid to the Financial Services Professional or Financial Services Professional's Broker/Dealer by the Adviser quarterly or monthly during the continuation of your investment management relationship with the Adviser, which, you have agreed, shall be until such time as you or the Adviser provides the other with written notice of termination. 4. Your fee will not increase based upon the Adviser's obligation to pay the Referral Fee to the Financial Services Professional or the Financial Services Professional's Broker/Dealer. 5. You and the Financial Services Professional, represent, covenant warrant and acknowledge and agree that at all times, the Financial Services Professional shall: (a) Serve as agent for Adviser in referring clients to Adviser, and will assist the client in establishing an account with Adviser and providing related administrative services. Each client will execute an investment management agreement prior to establishing an account. (b) Through an intake form or informal intake process approved by Adviser, Financial Services Professional shall gather each client's financial information and communicate that information to Adviser. You also authorize the Adviser to share your account-related information with the Financial Services Professional and/or the Financial Services Professional's Broker/Dealer or Registered Investment Advisory Firm for as long as you maintain a relationship with Financial Services Professional or until you advise us, in writing, to the contrary, whichever occurs first.

CLIENT ACKNOWLEDGEMENT

I acknowledge receipt of Solicitor's Disclosure Statement and understand and agree that; (a) The Solicitor and Atlas Capital Management Corporation, as Adviser, will enter into a limited agency agreement relating to the services to be provided to me by the Adviser pursuant to which the Solicitor will be paid a referral fee as described above. (b) The Solicitor will describe Adviser's services but will render no investment advice to me on behalf of the Adviser. (c) If there is a commission associated with the purchase of a particular investment (as purchased by me in conjunction with the engagement of the Solicitor/Broker-Dealer of my choosing), the commission purchase(s) is separate from my engagement of the Adviser. I will be responsible for the payment of any such commissions to the corresponding Broker/Dealer same, no portion of which shall be received by or shared with the Adviser; (d) I acknowledge receipt of the Disclosure Statement and understand and agree that; (a) The Financial Services Professional will be paid a referral fee as described above. (b) The Financial Services Professional will describe Adviser's services but will render no investment advice to me on behalf of the Adviser. (c) If there is a commission associated with the purchase of a particular investment (as purchased by me in conjunction with the engagement of the Financial Services Professional/Broker-Dealer of my choosing), the commission purchase(s) is separate from my engagement of the Adviser. I will be responsible for the payment of any such commissions to the corresponding Broker/Dealer and the Adviser will not receive any portion of the commission.

As described above, Adviser shall remain entitled to rely upon the Solicitor/Broker-Dealer for the explanation of Adviser's services, all instructions regarding same and all initial and ongoing suitability determinations. I agree to release and hold Adviser harmless for any failure (or alleged) failure of the Solicitor/Broker-Dealer to provide such services or instructions. I acknowledge receipt of the Disclosure Statement and understand and agree that; (a) The Financial Services Professional will be paid a referral fee as described above. (b) The Financial Services Professional will describe Adviser's services but will render no investment advice to me on behalf of the Adviser. (c) If there is a commission associated with the purchase of a particular investment (as purchased by me in conjunction with the engagement of the Financial Services Professional/Broker-Dealer of my choosing), the commission purchase(s) is separate from my engagement of the Adviser. I will be responsible for the payment of any such commissions to the corresponding Broker/Dealer and the Adviser will not receive any portion of the commission. Adviser and/or Solicitor may share client-related information with their respective agents in furtherance of their respective services to be provided to the client. I further acknowledge that I have read and understand the Adviser's Investment Management Agreement, the Adviser's Form CRS/Form ADV Part 3 (Client Relationship Summary), and the Adviser's Disclosure Statement (Part 2A of Form ADV and/or any successor disclosure statement thereto).

Atlas Capital Management Corp. 11130 Coldwater Road, Suite 104 Fort Wayne, IN 46845 Phone: (260) 637-2857 Fax: (260) 637-9707

Investment Strategies

Atlas Capital offers several Investment strategies to clients. Primarily we use actively managed portfolios encompassing mutual funds, exchange traded funds or money market funds. The investment strategy or strategies for a specific client are based on the client's election of a strategy on the Management Strategy Instruction Form. A brief description of the core strategies are included below. For additional information about Atlas Capital Management and the strategies employed, please refer to the Firm Brochure (FORM ADV Part 2A) available at www.adviserinfo.sec.gov. You may also request a copy of the Firm Brochure at any time by contacting us at (260) 637-2857, emailing us at atlascap@acmc.biz or visiting our website at www.atlascapitalmanagement.com.

Inverse or Leveraged Market Strategies

Atlas may utilize long and short mutual funds and/or exchange traded funds that are designed to perform an: (1) Inverse relationship to certain market indices (at a rate of 1 or more times the inverse [opposite] result of the corresponding index) as an investment strategy and /or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct Atlas, in writing, not to employ any or all such strategies for his/her/their/its accounts.

Biblically Responsible Investing

Biblically Responsible Investing (BRI) strategies were created specifically for investors who wish to reflect their Christian faith through their investments. Atlas Capital offers a variety of strategies that invest in a select list of mutual funds and ETF's that are aligned with biblical values and investing in a morally responsible manner. Funds families that invest in companies whose products and services are consistent with Christian values may under-perform funds managed without these constraints.

FIXED INCOME STRATEGY DESCRIPTIONS	
Bond Income	Primary objective of the Bond Income strategy is to provide income with capital gains as a secondary objective. Utilizing a variety of mutual funds, the Bond Income strategy shifts client assets among bond investments that concentrate on investing in U.S. treasury bonds, international bonds, corporate bonds, emerging market bonds, floating rate bonds and high yield bonds. The Bond Income strategy could be 100% invested in one sector of the bond market, diversified among multiple sectors, 100% money market or a combination of funds and money market.
Government Long / Short	The Atlas Capital Long/Short Government Bond strategy is a quantitatively based strategy that utilizes multiple uncorrelated tactical strategies and attempts to position assets to benefit from a rising or declining yield curve. The Strategy shifts clients' assets between leveraged and/or inverse mutual funds or ETF's that have an objective of benefiting regardless of interest rates. This strategy may hold cash or a money market fund.
Municipal Bonds – High Yield	The Atlas Capital High Yield Municipal Bond strategy has an objective of providing income that is exempt from federal personal income tax with a secondary objective of capital gains. The strategy shifts client assets among a select group of mutual funds and /or ETF's that invest primarily in high yield municipal bonds. This strategy may hold cash or money market fund.
Fixed Income	The Atlas Fixed Income strategy shifts client assets among mutual funds and ETF's that concentrate their investments in Money Market, Short-term or Long-term Treasury Bonds, International Bonds, Corporate Bonds, Emerging Market Bonds, or High Yield Bonds.

TACTICAL STRATEGY DESCRIPTIONS	
Classic	The Classic strategy exchanges client assets between selected U.S. equity investments (mutual funds or ETF's) and a money market fund. Depending upon market conditions the Classic Strategy could be 100% invested in one investment style, diversified among styles, or 100% money market.
Classic Long / Short	The Classic Long/Short strategy exchanges between Large-Cap, Small-Cap, or NASDAQ-100 mutual funds or ETF's when our indicators are positive and Inverse Large-Cap, Inverse Small-Cap, or Inverse NASDAQ-100 mutual funds or ETF's when negative.
Quest	The Quest strategy exchanges assets between selected U.S. equity investments (mutual funds or ETF's) and a money market fund. Depending upon market conditions the Quest strategy could be 100% invested in one investment style, diversified among styles, or 100% money market.
Aviator	The Aviator strategy is a Long/Short /Cash strategy that exchanges assets between selected equity investments that are designed to provide 2X the movement of the NASDAQ-100, inverse 2X of the NASDAQ-100, or 100% cash. Depending upon market conditions the Aviator strategy could be 100% invested in a fund designed to provide 2X the return of the NASDAQ-100, 100% in a fund designed to provide the inverse 2X the return of the NASDAQ-100, or 100% in a money market fund.

Crescendo	The Crescendo strategy is a Long/Short/Cash strategy that exchanges client assets between selected equity investments that are designed to provide 2X the movement of the NASDAQ-100 and/or the Russell 2000, inverse 2X of the NASDAQ-100 and/or the Russell 2000 or 100% cash. The strategy is designed to move freely in and out of positions in "incremental steps". The strategy could be invested 100% in a fund designed to provide 2X the return, including inverse of the NASDAQ-100 or Russell 2000, a combination of the two, 100% in money market or invested in various percentages in various investments.
High Yield	The Atlas Capital High Yield strategy shifts client assets among High Yield investments and money market accounts. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. Assets are either 100% invested in High Yield funds or ETF's or 100% invested in the money market account.
High Yield Long / Short	The Atlas Capital High Yield Long/Short strategy shifts client assets among High Yield mutual funds or exchange traded funds (ETF's) when the model is positive and mutual funds or exchange traded funds that seek to provide investment results that correspond generally to the inverse of the total return high yield market consistent with maintaining reasonable liquidity with the model is negative. Assets are either 100% invested in High Yield funds or ETF's or 100% invested in Inverse High Yield funds or ETF's.

TACTICAL TAX-EFFICIENT STRATEGY DESCRIPTIONS	
Elevation	The Elevation Strategy is a long-term, growth strategy designed for investors seeking a risk-managed, tax-sensitive portfolio approach with the goal of producing gains that would qualify as long-term for tax purposes, while seeking to avoid the majority of the markets major downturns like those that occurred in 2000-2002 and 2007-2009. The core investments are placed in mutual funds or ETF's that are designed to mirror the various major indices. In certain market environments, a portion of the core holdings will be allocated to mutual funds or ETF's that are designed to produce 2X the return of their underlying indices.

ROTATIONAL STRATEGY DESCRIPTIONS	
Equity Growth	The Equity Growth strategy uses funds or ETF's encompassing a variety of investment objectives including but not limited to Aggressive Growth, Growth, Growth & Income, Equity Income and Small Company. The funds may be Large-Cap, Mid-Cap, or Small-Cap investment styles. These funds invest in U.S. Equity Securities. Has the ability to move to 100% money market.
All Funds Growth	The All Funds Growth strategy includes all the funds or ETF's available in the Equity Growth strategy, plus International Equity and Bond funds of all types are included. The International funds are generally considered diversified (not country specific) and the bond funds include all investment strategies including but not limited to Government, Corporate, International and High Yield. The bond funds may have short, medium or long maturity structures. Has the ability to move to 100% money market.

TRADITIONAL STRATEGY DESCRIPTIONS	
Perpetual Equity Growth	The Perpetual Equity Growth strategy is an active investment approach that is continuously invested in the U.S. equity market and distributes client assets among different investment styles or asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. Depending upon market conditions the Perpetual Equity Growth strategy can be invested in one equity style or diversified among asset classes.
Perpetual World Equity Growth	The Perpetual World Equity Growth strategy is an active investment approach that is continuously invested in the equity markets, United States and/or International, and distributes client assets among different investment styles or asset classes within the marketplace. International options may include, but not limited to, World, European, Far East, Latin America, and Emerging Markets. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. Depending upon market conditions the Perpetual World Equity Growth strategy can be invested in one equity asset class or diversified among asset classes. This strategy could be 100% invested in the United States markets, 100% internationally, or a combination, depending on market conditions.

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NON-TRADITIONAL STRATEGY DESCRIPTIONS	
Alternative	The Alternative strategy uses funds or ETF's encompassing a variety of investment objectives that are considered non-traditional, including but not limited to, natural resources, precious metals, real estate, water, technology, infrastructure, electronics, commodities, communications and energy. The funds may invest in U.S. Securities and/or International Securities. The funds used in this strategy are exclusive of any other Atlas strategy and may be more volatile than other strategies.
Gold	The Atlas Capital Gold strategy is an active strategy that exchanges client assets between a money market fund and investment(s) (Mutual Fund or ETF's) that has an objective of mirroring the price of gold. When the Atlas gold model is positive, assets will be in one or more mutual funds and/or ETF's whose objective is to mirror as closely as possible the performance of the price of gold. When the model is negative, the assets will be invested in a money market account.
Silver	The Atlas Capital Silver strategy is an active strategy that exchanges client assets between a money market fund and investment(s) (Mutual Fund or ETF's) that has an objective of mirroring the price of silver. When the Atlas Silver model is positive, assets will be in one or more mutual funds and/or ETF's whose objective is to mirror as closely as possible the performance of the price of silver. When the model is negative, the assets will be invested in a money market account.
Oil	The Atlas Capital Oil strategy is an active strategy that exchanges client assets between a money market fund and the United States Oil Fund (USO), an ETF that trades on the NYSE Arca Stock exchange. When the Atlas Capital Oil Model is positive the assets are invested in the United States Oil Fund and when the model is negative the assets are moved into a money market fund.
Precious Metals 1.0X	The Atlas Capital Precious Metals 1.0X strategy is an active strategy that exchanges client assets between a money market fund and the Rydex Precious Metals Investor Class Fund (trading symbol RYPMX). When the Atlas Capital Precious Metals model is positive the assets are invested in RYPMX and when the model is negative the assets are moved into a money market fund.
Precious Metals 1.5X	The Atlas Capital Precious Metals 1.5X strategy is an active strategy that exchanges client assets between a money market fund and the ProFunds Precious Metals UltraSector Investor Class Fund (trading symbol PMPIX). When the Atlas Precious Metals 1.5X model is positive the assets are invested in PMPIX (a leveraged fund) and when the model is negative the assets are moved into a money market fund.
Precious Metals Long 1.0X / Short 1.0X	The Atlas Capital Precious Metals Long 1.0X / Short -1.0X strategy is an active strategy that exchanges client assets between the Rydex Precious Metals Investor Class Fund (trading symbol RYPMX) and the ProFunds Short Precious Metals Investor Class Fund (trading symbol SPPIX). When the Atlas Capital Precious Metals Long 1.0X / Short -1.0X model is positive the assets are invested in RYPMX and when the model is negative the assets are moved to SPPIX (an inverse fund).
Precious Metals Long 1.5X / Short 1.0X	The Atlas Capital Precious Metals Long 1.5X / Short -1.0X strategy is an active strategy that exchanges client assets between the ProFunds Precious Metals UltraSector Investor Class Fund (trading symbol PMPIX) and the ProFunds Short Precious Metals Investor Class Fund (trading symbol SPPIX). When the Long 1.5X / Short -1.0X model is positive the assets are invested in PMPIX (a leveraged fund) and when the model is negative the assets are moved to SPPIX (an inverse fund).

BIBLICALLY RESPONSIBLE INVESTING (BRI) STRATEGY DESCRIPTIONS - ALL BRI STRATEGIES USE INVESTMENT OPTIONS FROM FUND FAMILIES THAT INVEST IN COMPANIES WHOSE PRODUCTS AND SERVICES ARE CONSISTENT WITH CHRISTIAN VALUES. FUNDS THAT IMPOSE THESE CONSTRAINTS MAY ELIMINATE SECURITIES OR SECTORS THAT COULD HAVE PROVIDED SUPERIOR RESULTS. THESE CONSTRAINTS COULD CAUSE THESE FUNDS TO SIGNIFICANTLY UNDER-PERFORM FUNDS MANAGED WITHOUT THESE CONSTRAINTS.	
BRI Bond Income	Primary objective of the BRI Bond Income strategy is to provide income with capital gains as a secondary objective. Utilizing a variety of mutual funds, the BRI Bond Income strategy shifts client assets among bond investments that concentrate on investing in U.S. treasury bonds, international bonds, corporate bonds, emerging market bonds, floating rate bonds and high yield bonds. The BRI Bond Income strategy could be 100% invested in one sector of the bond market, diversified among multiple sectors, 100% money market or a combination of funds and money market.
BRI Classic	The BRI Classic strategy exchanges client assets between selected BRI U.S. equity funds or ETF's and a money market fund. Depending upon market conditions the strategy could be 100% invested in one investment style, diversified among styles, or 100% money market.
BRI Quest	The BRI Quest strategy exchanges client assets between selected BRI U.S. equity funds or ETF's and a money market fund. Depending upon market conditions the strategy could be 100% invested in one investment style, diversified among styles, or 100% money market.

BRI High Yield	The BRI High Yield strategy shifts client assets among selected BRI High Yield investments and money market accounts. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. Assets are either 100% invested in BRI High Yield funds or ETF's or 100% invested in the money market account.
BRI Equity Growth	The BRI Equity Growth strategy uses select BRI U.S. equity funds or ETF's encompassing a variety of investment objectives including but not limited to Aggressive Growth, Growth, Growth & Income, Equity Income and Small Company. The funds may be Large-Cap, Mid-Cap, or Small-Cap investment styles. These funds invest in U.S. Equity Securities. Has the ability to move to 100% money market.
BRI All Funds Growth	The BRI All Funds Growth strategy includes all the funds or ETF's available in the BRI Equity Growth strategy, plus International Equity and Bond funds of all types are included. The International funds are generally considered diversified (not country specific) and the bond funds include all investment strategies including but not limited to Government, Corporate, International and High Yield. The bond funds may have short, medium or long maturity structures. Has the ability to move to 100% money market.
BRI Perpetual Equity Growth	The BRI Perpetual Equity Growth strategy is an active investment approach that is continuously invested in appropriate BRI U.S. equity market (mutual funds/ETF's) and distributes assets among different investment styles or asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. Depending upon market conditions the BRI Perpetual Equity Growth strategy can be invested in one equity style or diversified among asset classes.
BRI Perpetual World Equity Growth	The BRI Perpetual World Equity Growth strategy is an active investment approach that is continuously invested in appropriate BRI equity markets, United States and/or International (mutual funds/ETF's), and distributes assets among different investment styles or asset classes within the marketplace. International options may include, but not limited to, World, European, Far East, Latin America, and Emerging Markets. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The BRI Perpetual World Equity Growth Strategy can be invested in one equity asset class or diversified among asset classes. Depending upon market conditions this strategy could be 100% invested in the United States markets, 100% internationally, or a combination.

PLEASE NOTE: PRIOR TO EXECUTION. THE ADVISER REMAINS AVAILABLE TO ADDRESS ANY QUESTIONS THAT THE CLIENT MAY HAVE REGARDING ANY PORTION OF THE ABOVE PRIOR TO EXECUTION BY THE CLIENT. FOR ADDITIONAL INFORMATION ON ANY OF ATLAS CAPITAL MANAGEMENT'S STRATEGIES, PLEASE CONSULT THE FIRM BROCHURE FORM ADV PART 2A.

PLEASE PROCEED TO NEXT PAGE

Management Strategy Instruction Form

STRATEGY	ACCOUNT NUMBER	ACCOUNT NUMBER	ACCOUNT NUMBER	ACCOUNT NUMBER
	_____	_____	_____	_____
Bond Income	Percentage	Percentage	Percentage	Percentage
Government Long / Short [1,2,3]	Percentage	Percentage	Percentage	Percentage
Municipal Bonds – High Yield [2]	Percentage	Percentage	Percentage	Percentage
Fixed Income [2]	Percentage	Percentage	Percentage	Percentage
Classic	Percentage	Percentage	Percentage	Percentage
Classic Long / Short [1,3]	Percentage	Percentage	Percentage	Percentage
Quest	Percentage	Percentage	Percentage	Percentage
Aviator [1,3]	Percentage	Percentage	Percentage	Percentage
Crescendo [1,3]	Percentage	Percentage	Percentage	Percentage
High Yield	Percentage	Percentage	Percentage	Percentage
High Yield Long / Short [1,2,3]	Percentage	Percentage	Percentage	Percentage
Elevation [3]	Percentage	Percentage	Percentage	Percentage
Elevation Plus [2,3] (Not Currently Available)	Percentage	Percentage	Percentage	Percentage
Equity Growth	Percentage	Percentage	Percentage	Percentage
All Funds Growth	Percentage	Percentage	Percentage	Percentage
Perpetual Equity Growth	Percentage	Percentage	Percentage	Percentage
Perpetual World Equity Growth	Percentage	Percentage	Percentage	Percentage
Alternative	Percentage	Percentage	Percentage	Percentage
Gold [1]	Percentage	Percentage	Percentage	Percentage
Silver [1,2]	Percentage	Percentage	Percentage	Percentage
Oil [1,2,5]	Percentage	Percentage	Percentage	Percentage
Precious Metals 1.0X [1]	Percentage	Percentage	Percentage	Percentage
Precious Metals 1.5X [1,2,3]	Percentage	Percentage	Percentage	Percentage
Precious Metals Long 1.0X / Short 1.0X [1,2,3]	Percentage	Percentage	Percentage	Percentage
Precious Metals Long 1.5X / Short 1.0X [1,2,3]	Percentage	Percentage	Percentage	Percentage
BRI Bond Income [2,4]	Percentage	Percentage	Percentage	Percentage
BRI Classic [2,4]	Percentage	Percentage	Percentage	Percentage
BRI Quest [2,4]	Percentage	Percentage	Percentage	Percentage
BRI High Yield [2,4]	Percentage	Percentage	Percentage	Percentage
BRI Equity Growth [2,4]	Percentage	Percentage	Percentage	Percentage
BRI All Funds Growth [2,4]	Percentage	Percentage	Percentage	Percentage
BRI Perpetual Equity Growth [2,4]	Percentage	Percentage	Percentage	Percentage
BRI Perpetual World Equity Growth [2,4]	Percentage	Percentage	Percentage	Percentage
TOTAL PERCENTAGE	**100%**	**100%**	**100%**	**100%**

[1] It is the recommendation of Atlas Capital to limit a client's investing no more than 50% of their investable net worth in the strategies that use these investment options. (Elevation and Elevation Plus are exempt from the 50% recommendation)
[2] This strategy is not available at all custodians. Please contact Atlas Capital Management directly to confirm availability.
[3] This strategy may use leveraged and/or inverse investment options.
[4] BRI = Biblically Responsible Investing. Funds that impose faith-based values may significantly under-perform funds managed without these constraints. To participate in sharing program please submit the Atlas Sharing Program Designation Form.
[5] Tax treatment notice - Investing in the Atlas Capital Oil Strategy may result in clients receiving a K-1 in addition to forms 1099-B and 1099-Div.

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Management Strategy Instruction Form

DISCLOSURE PURSUANT TO RULE 206(4)-3 UNDER THE INVESTMENT ADVISERS ACT OF 1940

I have read Atlas Capital Management's Investment Management Agreement in its entirety including the termination section of the document, Atlas Capital's Firm Brochure (FORM ADV Part 2A); Atlas Capital's Form CRS/Form ADV Part 3 (Client Relationship Summary) and hereby agree to terms set forth. By execution below, you: (1) acknowledge that your financial professional has discussed with you the above contractual and disclosure information, as well as the potential adverse financial consequences pertaining to such selected strategies; (2) acknowledge that you have read the risk disclosure information for strategies that may use leveraged, inverse, gold, silver, precious metals , or oil as investment options; (3) acknowledge the risks associated with the selected strategy(ies) and that there can be no assurance that the strategy(ies) selected will be successful at any given time or over any given period; (4) are prepared to accept any adverse financial consequences resulting from your decision to allocate assets to the strategy(ies); (5) that the use of leveraged, inverse, precious metals, gold, silver, government bonds, or oil investments generally increase the risk of investing in these funds and/or ETFs, especially in volatile markets; (6) understand that regarding the Oil strategy, investments may be made in the United States Oil Fund (USO) which contains numerous risks, such as but not limited to, contract risk, counter-party risk, correlation to benchmark, tax risk, as USO is organized and operated as a limited partnership which has a more complex tax treatment than conventional mutual funds. Investments in USO may result in clients receiving a Schedule K-1 in addition to forms 1099-B and 1099-Div. K-1's are required to be provided by March 15 and may result in a delay in shareholders ability to file their income tax returns prior to receiving this form. K-1's are supplied only to shareholders at their address of record. Additional information may be found at www.uscfinvestments.com/k1-information. (7) agree that Atlas Capital Management shall rely on your above acknowledgments and representations until such time as you (or your below Financial Professional) have advised Atlas Capital Management, in writing, to the contrary; (8) Atlas Capital Management's obligation shall be limited to your assets consistent with the designated strategies; (9) agree to release and hold Atlas Capital Management harmless from any adverse consequences resulting from your decision, including any claim that any such strategy (or combinations thereof) was unsuitable or inappropriate and, (10) PLEASE NOTE: PRIOR TO EXECUTION. The adviser remains available to address any questions that the client may have regarding any portion of the above prior to execution by the client. For additional information on any of Atlas Capital Management's strategies, please consult the firm brochure Form ADV Part 2A.

Primary Account Owner Name:	
Primary Account Owner Signature:	**Date:**
Secondary Account Owner Name:	
Secondary Account Owner Signature:	**Date:**

Name of Financial Services Professional:	
Signature of Financial Services Professional:	**Date:**
Name of Broker/Dealer or RIA Firm:	
Upon acceptance of Investment Management Agreement by Atlas Capital Management an executed copy of this Investment Management Agreement will be returned to you via your preferred method of communication. ANY QUESTIONS: Atlas Capital Management remains available to address any questions or concerns you may have regarding this form and corresponding investment strategies.	
Home Office Use Only	
Accepted by:	**Title:**
Atlas Capital Management Signature:	**Date:**

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Atlas Capital Management

MANAGE THE RISK. MAXIMIZE THE OPPORTUNITY.

FIRM BROCHURE - (FORM ADV PART 2A)

Effective February 28th, 2021

This brochure provides information about the qualifications and business practices of Atlas Capital Management Corp. If you have any questions about the contents of this brochure, please contact Atlas Capital Management Corp. at (260) 637.2857 or atlascap@acmc.biz. Atlas Capital Management is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. This disclosure brochure provides information about Atlas to assist you in determining whether to retain Atlas. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Atlas Capital Management Corp. is available at the company's website; www.atlascapitalmanagement.com. You can also access the United States Securities and Exchange Commission website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Atlas Capital Management Corp. is 106107.

Atlas Capital Management Corp.
CRD 106107
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Fort Wayne, IN 46845
Phone: 260.637.2857
Fax: 260.637.9707
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Item 2 Material Changes

Form ADV Part 2A (the "Disclosure Brochure") provides information about a variety of topics relating to an Advisor's business practices and possible conflicts of interest. Part 2B (the "Brochure Supplement") provides information about the advisory personnel of Atlas Capital Management Corp. Atlas believes that straightforward communication is the foundation to our relationship and continuously strives to provide our Clients with complete and accurate information at all times. We encourage all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. Atlas Capital Managements Chief Compliance Officer, Jerry Jacobs, remains available to address any questions or feedback that a Client or prospective Client may have regarding the Disclosure Brochure or Brochure Supplement.

FORM ADV Changes

Our last annual update to this firm brochure was on July 30, 2020. Since that update, there have been no material changes.

Future Changes

From time to time, we may amend this Disclosure Brochure and Brochure Supplement to reflect changes in our business practices, changes in current regulations and routine annual updates as required by the securities regulators. The complete Disclosure Brochure or a Summary of Material Changes shall be made available to each Client annually and if a material change occurs in the business practices of Atlas Capital.

At any time, you may view the current Disclosure Brochure at the Securities Exchange Commissions Investment Adviser Public Disclosure website directly at **www.adviserinfo.sec.gov** or on the Atlas Capital Management website **www.atlascapitalmanagement.com**. You may also request a copy of this Disclosure Brochure by contacting us at 260.637.2857 or emailing atlascap@acmc.biz.

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Item 4 Advisory Business

Firm Description

Atlas Capital Management Corp. (Atlas Capital) was founded in 1993 by Jerry L. Jacobs. The firm is federally registered with the SEC (Securities Exchange Commission) as a Registered Investment Adviser. Atlas Capital provides investment management to individuals, families and their related entities, trust and estates, and family businesses. Atlas Capital allocates the investment management assets of its client accounts, on a discretionary basis, among one or more of its proprietary asset management programs. In addition to our discretionary management services, we also provide non-discretionary consulting services to selected clients. Atlas Capital's proprietary programs have been designed to comply with the requirements of Rule 3a-4 of the Investment Company Act of 1940. Rule 3a-4 provides similarly managed investment programs with a nonexclusive safe harbor from the definition of an investment company. In accordance with Rule 3a-4, the following disclosure is specifically applicable to Registrant's management of client assets.

ERISA/IRC Fiduciary Acknowledgement

If the client is: (i) a retirement plan ("Plan") organized under the Employee Retirement Income Security Act of 1974 ("ERISA"); (ii) a participant or beneficiary of a Plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code, with authority to direct the investment of assets in his or her Plan account or to take a distribution; (iii) the beneficial owner of an Individual Retirement Account ("IRA") acting on behalf of the IRA; or (iv) a Retail Fiduciary with respect to a plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code: then Atlas Capital represents that it and its representatives are fiduciaries under ERISA or the Internal Revenue Code, or both, with respect to any investment advice provided by Atlas Capital or its representatives or with respect to any investment recommendations regarding an ERISA Plan or participant or beneficiary account.

At the opening of the account an employee of Atlas Capital or a designated representative i.e., the solicitor (see disclosures contained below within Item 4 and contained in Item 14), will obtain from the client information sufficient to determine the client's financial situation and investment objectives. The account will receive individual treatment, meaning the client's account is managed on the basis of the client's financial situation and investment objectives. Atlas Capital will not commingle client assets (No Pooling) meaning the clients beneficial interest in a security does not represent an undivided interest in all the securities held by the custodian, but rather represents a direct and beneficial interest in the securities which comprise the client's account. Each client retains indicia of ownership of the account (i.e. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations). At least quarterly Atlas Capital shall notify the client to advise Atlas Capital whether the client's financial situation or investment objectives have changed, or if the client wants to impose and/or modify any reasonable restrictions on the management of his/her/its account. Atlas Capital shall be reasonably available to consult with the client relative to the status of the client's account. All Assets are held at qualified custodians, who provide quarterly account statements directly to clients at their address of record or electronically if client so elects. Client acknowledges and understands that Atlas Capitals' management programs may involve above-average portfolio turnover which could negatively impact upon the net after-tax gain experienced by the client in non-qualified accounts. Client acknowledges that not all trades are expected to be profitable and there may be short-term losses, there will be instances where it will be necessary to reenter the market at a higher level than that of the last exit. Additionally, it is possible for client to receive distributions from funds that create a taxable gain and corresponding tax liability, when their account shown no actual gain or possibly a loss.

Principal Owner
Jerry L. Jacobs is 100% stockholder of Atlas Capital Management Corp. There are no intermediate subsidiaries.

Types of Advisory Services
The primary type of advisory service offered by Atlas Capital is investment supervisory services (i.e., "asset management"). In addition to our discretionary management services, we also provide non-discretionary consulting services to selected clients. In performing its services, Atlas Capital is not required to verify any information received from the client or from the client's other professionals. Each client is advised that it remains his/her responsibility to promptly notify Atlas Capital when there is any change in his/her financial situation and /or financial objectives for the purpose of reviewing, evaluating, or revising services. At least quarterly the Adviser shall contact the client electronically, through the U.S. Mail or through the use of a custodial statement to determine whether the clients' financial situation or investment objectives have changed.

Managed Assets
As of February 28th 2021 Atlas Capital managed/consulted on $238,536,601.86. $226,725,827 for approximately 2,025 accounts on a discretionary basis. In addition, Atlas Capital has consulted on approximately 153 additional accounts on a non-discretionary basis; these assets totaled approximately $11,810,774 dollars.

Custody Fees
Under Atlas Capitals' Investment Management Agreement, when a client custodies assets at E*TRADE Advisor Services, E*TRADE Advisor Services charges an annual custody fee based on the value of the clients account and/or may charge transaction fees when purchases or sales are made. E*TRADE Advisor Services computes custody fees based on the Average Daily Balance of the account per the schedule below:

E*TRADE Account value between $0 -$250,000……..10 basis points (.10 of 1%)
E*TRADE Account value between $250,001- $999,999…..6 basis points (.06 of 1%)
E*TRADE Account value $1,000,000 and greater……..3 basis points (.03 of 1%)

Regardless of the type of agreement all Clients are advised to check each fund's prospectus for any redemption fees.

Transaction Cost(s)
(Redemption fees for Open ended Mutual Funds) Open-end mutual funds are purchased for Clients accounts that have no initial expenses. Adviser may purchase funds that impose short term redemption fees, however when such funds are purchased it is the practice of the Adviser to hold these funds until the short term fees are not applicable. Client is advised that if Client terminates this management agreement and requests liquidation of assets, any redemption fees will be the sole responsibility of the Client. If Client requests partial withdrawal the same applies. Clients utilizing Atlas Capital's Investment Consulting Agreement may incur transaction charges for each stock, mutual fund, fixed income security, or exchange traded fund (ETF) transaction. Adviser does not share in any redemption fees or transaction fees that are imposed by any fund or custodian. These charges are different than charges incurred by Investment Management clients. When ETF's are transacted for Client's investment management accounts there may be a transaction fee imposed. This transaction cost is charged by the custodian or Broker/Dealer that has custody of the account. It is anticipated that by combining orders for multiple

accounts the cost for each Client will be substantially less than if they were done individually. Although the purchases and sales are combined to minimize expenses, all Clients' maintain an individual segregated account at the custodian. Client is advised that if Client terminates this management agreement and requests liquidation of the assets the transaction costs may be greater than when bulk purchases were made. If client requests partial withdrawal the same applies. Adviser does not share in any transaction expenses charged by the custodian or Broker/Dealer.

Miscellaneous

Non-Investment Consulting/Implementation Services. Neither Atlas Capital, nor any of our representatives, serves as an attorney and no portion of Atlas' services should be construed as legal advice. To the extent requested by a client, Atlas may recommend the services of professionals for certain non-investment implementation purposes (i.e. attorneys, tax advisors, accountants, insurance agents, etc.), including Todd Clark who is an investment adviser representative of Atlas Capital. Mr. Clark is a tax preparer and licensed insurance agent and may perform certain tax preparation services and/or commissionable insurance sales in his individual capacity, separate and apart from the investment management services provided by Atlas Capital. The client is under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation from Atlas.
Please Note: The recommendation by Mr. Clark that a client utilize his tax preparation services and/or purchase an insurance commission product from him presents a conflict of interests, as Mr. Clark has an economic incentive to recommend his tax preparation or insurance sales services based on the compensation to be received, rather than basing such recommendation on a particular client's best interest. If the client engages any such recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. **Please Also Note:** It remains the client's responsibility to promptly notify Atlas if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Atlas' previous recommendations and/or services.

Cash Positions

At any specific point in time, depending upon perceived or anticipated market conditions/events (there being no guarantee that such anticipated market conditions/events will occur), Atlas may maintain cash positions for defensive purposes and/or as part of one of an investment strategy. All cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating the Registrant's advisory fee. The Registrant's Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective may have regarding the above fee billing practice.

Introduction from Primary Investment Professional/Solicitors

Atlas Capital Management provides investment management services to clients who are introduced to the firm through the client's primary investment professional, including an adviser that serves as a solicitor to Atlas Capital Management. In these type engagements, the client shall be requested to acknowledge and agree that: (1) at all times, the Investment Professional shall serve as the client's primary investment professional, and shall be responsible for: (a) assisting client in determining the client's initial and ongoing suitability for Atlas's investment portfolios and/or strategies, and (b) receiving/ascertaining client's directions, notices, and instructions, and forwarding them to Atlas in writing. Atlas's only obligation shall be to manage the assets consistent with the designated investment strategy. Atlas Capital Management shall be entitled to rely upon any such direction, notice, or instruction until it has been duly advised in writing of changes therein. (1) Atlas shall have no responsibility to the client for the failure of the Investment Professional to timely

receive/ascertain/forward/communicate any and all such directions, notices, and instructions; (2) Atlas is permitted to share account-related information with Investment Professional until such time as client notifies Atlas, in writing, to the contrary; and (3) if Atlas is directed to effect account transactions though a specific broker-dealer/custodian, Atlas will be unable to negotiate commissions and/or transaction costs, and/or seek better execution. As a result, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case through alternative brokerage/custody arrangement. Higher transaction costs adversely impact account performance. Please see additional disclosure at Item 14 below.

Please Note: Atlas Capital Management may occasionally reimburse certain broker dealers or investment advisers for certain expenses and the broker dealer or investment adviser may pass along those payments to the representative making a referral. These additional payments will not cause the client to pay additional money in management fees. Such additional expense reimbursements will come directly from Atlas Capital Management's receipt of management fees and will be paid directly to the respective broker dealer or Registered Investment Advisory firm and not to any individual representative. This may present a conflict of interest in that the broker dealer, investment adviser or their representatives may make a referral based on the expectation of future expense reimbursements and not necessarily based on the quality of investment advice rendered. Atlas Capital Management attempts to resolve this expense reimbursement conflict by requiring preclearance from the Chief Compliance Officer prior to disbursing any funds. The CCO will determine whether any such reimbursement is material in amount or frequency to cause any additional concerns. The CCO may use his judgment in approving or denying such reimbursement. The solicitor will continue to receive a referral fee for the duration of the client's relationship with Atlas Capital Management and therefore may have an incentive to continue the recommendation of Atlas Capital Management and its services. The Registrant's Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding this arrangement.

Investment Risk

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Atlas Capital Management) will be profitable or equal any specific performance level(s).

Client Obligations

In performing its services, Atlas Capital Management shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains his/her/its responsibility to promptly notify Atlas Capital Management if there is ever any change in his/her/its financial situation or investment objectives for the purpose of reviewing/evaluating/revising Atlas Capital Management's previous recommendations and/or services.

At least quarterly the Adviser shall contact the client electronically, through the U.S. Mail or through the use of a custodial statement to determine whether the clients' financial situation or investment objectives have changed. Neither Atlas nor the client may assign the Investment Management Agreement without the prior written consent of the other party. Transactions that do not result in a change of actual control or management shall not be considered an assignment. A copy of Atlas' written

disclosure statement as set forth on Part 2A of Form ADV shall be provided to each client prior to or contemporaneously with the execution of the Investment Management Agreement.

Item 5 Fees and Compensation

Description

Atlas Capitals' compensation is solely from fees paid directly by clients. The firm does not receive commission based on the clients' purchase of any financial product, including insurance. No commissions in any form are accepted. No benefits are received by Atlas Capital from custodians/broker-dealers based on client securities transactions ("soft dollar benefits") Assets under the direct management of Atlas Capital are held by independent custodians, including E*TRADE Advisor Services, various insurance carriers, or others, in the client's name. Atlas offers proprietary strategies built with its trade signals and strategies created using trade signals from independent signal providers. This creates a financial incentive to recommend its own strategies because it does not pay a portion of the management fee to signal provider when recommending a proprietary strategy. Atlas attempts to mitigate any conflicts of interest to the best of its ability by acting in the client's best interest through its fiduciary duty.

Atlas Capital does not act as custodian of client assets. Since custodians do not verify the accuracy of the advisory and custody fee calculations, clients should review each custodial statement and promptly contact Atlas if any questions should arise. Atlas Capitals' basic fee structure is as follows:

First $250,000.....2.00%
Next $250,000.....1.75%
Next $500,000.....1.50%
Thereafter.....1.00%

Atlas Capital may enter into a consulting arrangement with selected clients where Atlas Capital will provide non-discretionary recommendations. The client may accept, reject or modify these recommendations. The fee for this consulting agreement may be either a fixed annual fee, or a negotiated percentage of the clients' account (prorated for additions and withdrawals). These fees are charged monthly in arrears and are based on the requirement of the client and are negotiated at the time the agreement is signed. Atlas Capital does not act as custodian of consulting assets. The Registrant's Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective may have regarding the above consulting arrangements.

Fee Billing

Fees will be determined by using the market value of client's accounts at the close of each calendar quarter, multiplied by the appropriate fee structure. For clients that are accepted during any quarter, the management fee will be prorated for the remainder of the quarter. With the billing period beginning October 1, 2020, Atlas will begin using average daily balance to calculate advisory fees at E*Trade Advisor Services and any other custodian where average daily balances are available. Beginning October 1, 2020 and going forward, investment advisor fees will be calculated and billed monthly, using average daily balances, replacing quarterly billing. This replaces calculations using end of quarter balances with all deposits and withdrawals prorated for actual time invested. At all other custodians where average daily balances are unavailable, fee calculations will use end of month values, with deposits and withdrawals prorated.

Fees are negotiable at the sole discretion of the President of Atlas Capital. Atlas believes that the annual fee is reasonable in relation to: 1) the Management services provided and 2) the fees charged by other

investment adviser's offering similar services/programs. However, Atlas Capital's annual investment management fee may be higher than that charged by other investment advisers offering similar services/programs. Clients utilizing Atlas Capital as asset manager may choose to have fees deducted quarterly/monthly in arrears from the account being managed, deducted from another designated account at their qualified custodian, or to be invoiced quarterly/monthly. The client must consent in advance to direct debiting of their investment account for management fees. Investment Management fees for non-qualified accounts may not be deducted from qualified accounts. Accounts in the same household may be aggregated for the purposes of determining the applicable program fee rate.

Other Fees

Atlas Capital's management fee for assets in Mutual Fund shares, Exchange Traded Funds, Variable Annuity, or Variable Life accounts is for active management with respect to these accounts. Atlas Capital's management fees for active management with respect to said accounts are separate and distinct from and in addition to the fees and expenses charged by the Mutual Funds, Exchange Traded Funds, Variable Annuities, or Variable Life accounts in which client's assets are invested. A description of such fees and expenses is available in each Mutual Fund, Variable Annuity's, or Variable Life's prospectus. Clients that select the basic fee schedule are billed quarterly in arrears. The investment fee will be a percentage of the market value of the investment account.

Custodians may charge transaction fees on the purchase or sales of certain investments. These transaction charges are usually relatively small and are incidental to the purchase of the security. In some cases, custodians also charge monthly, quarterly, or annual custody fees. Mutual funds and exchange traded funds are managed by other advisers, who charge a management fee for their services as investment managers. The management fee is included in the expense ratio. Mutual fund fees also include transaction charges for the purchase or sale of securities within the fund and may charge other fees as disclosed in the fund prospectus. These fees are in addition to the fees paid by the client to Atlas Capital. Please see the section entitled "Brokerage Practices" for more information.

It should be noted that all investments incur expenses, which are paid from fund assets. Such expenses include, without limitation, investment advisory fees and charges by certain Investments of 12b-1, revenue sharing, administrative or shareholder servicing fees, or certain other fees, all of which reduce the Net Asset Value of the Investments on a continuing basis. In addition, variable annuities charge other expenses in the same manner, including mortality charges. All such fees and expenses are reflected in the value of the fund's shares and are therefore indirectly incurred by Clients in addition to the fees detailed above. From time to time such 12b-1, revenue sharing, administrative or servicing fees may be available to the Custodian of assets. Any such payments payable on fund positions held in Client accounts at the custodian are directed to and retained by the custodian. No such fees are collected directly by Adviser.

Termination of Agreement

The Investment Management Agreement will remain in effect until terminated by either party by written notice to the other (electronic mail will not suffice). Telefax may be accepted at the sole discretion of the Adviser. Because of the unreliability of telefaxes, clients that elect to terminate their investment management agreement via telefax are advised that it is their responsibility to confirm receipt of telefax by Atlas Capital. Written notice must be signed by the terminating party(ies). Termination of this Agreement will not affect (i) the validity of any action previously taken by Adviser under this Agreement; (ii) liabilities or obligations of the parties from transactions initiated before termination of this Agreement; or (iii) Client's obligation to pay advisory fees (prorated through the date

that Adviser receives and accepts a written termination notice from the Client, unless the termination date is a mutually agreed upon date subsequent to the Adviser's receipt of the written termination notice). Upon the termination of this Agreement, Adviser will have no obligation to recommend or take any action with regard to the securities, money market or other investments in the Account. In the event that the Client terminates this agreement or withdraws any portion of the Account without prior or simultaneous notification to the Adviser, the Client acknowledges and agrees that the Account shall incur, in addition to and together with the quarterly investment management fee due to the Adviser, an administrative fee of .5% of the withdrawn amount (subject to a minimum administrative fee of $250.00). Client(s) submission of account transfer instructions, Client(s) removal of Adviser from management of their account at the custodian, or requests from Client(s) to close their account(s) that are presented to Custodian does NOT constitute notification to Adviser. Clients(s) or their authorized agent that make investment transactions or exchanges within their account, without the consent of Atlas Capital, may constitute termination of management and client(s) are subject to the administrative fee for termination without notice. Whether such transactions or exchanges are considered termination is completely at the discretion of Atlas Capital. For legacy performance-based fee clients, any such client who terminates this agreement before the end of 365 days agrees to pay Adviser a fee equivalent to 2% of the accounts value, prorated for the actual number of days of management. In addition, legacy performance based contracts that are terminated after the end of the first measurement period but before the end of the current measurement period agree to pay Adviser a management fee of 2% of the account value prorated from the end of the previous measurement period or a performance fee based on the 365 days previous to the termination, whichever is greater. In computing the final performance fee a credit will be given for results achieved during any overlapping time period of the previous measurement period.

Item 6 Performance-Based Fees and Side-By-Side Management

Description

Atlas Capitals compensation is solely from fees paid directly by clients. The firm does not receive commission based on the clients' purchase of any financial product, including insurance. No commissions in any form are accepted. No benefits are received from custodians/broker-dealers based on client securities transactions ("soft dollar benefits") Assets under the direct management of Atlas Capital are held by independent custodians, including E*TRADE Advisor Services, various insurance carriers, or others, in the client's name. Atlas Capital does not act as custodian of client assets.

Due to recent regulatory changes and in an effort to bring Atlas Capital Management into compliance with the Department of Labor's definition of a "Level-Fee Fiduciary," Atlas Capital and its supervised persons have ceased offering new agreements that offer a performance-based compensation. However, several Atlas Clients maintain legacy performance-based fee arrangements, which are outlined below. For these legacy arrangements, Atlas provides two performance fee structures as follows:

Combination Fixed Fee and Performance Fee Schedule

1. The Fixed Fee Portion: Annual Fee of one half of one percent (.5%) per year of the value of the assets under management. At the end of each calendar quarter, Client will be billed one quarter of the annual fee (.125%). This rate will be multiplied by the value of the assets under management at the end of each calendar quarter. The fixed fee portion will be prorated for the actual days under management for the first billing. Any subsequent additions or withdrawals will also be prorated.

2. Performance Portion: The Performance Fee will equal 20% of the total return in excess of the target return that is 10% per year (4 calendar quarters). “Total Return” is defined as net realized and unrealized capital gains and losses, plus interest, dividends, and distributions for the measurement period. In order to compute the performance fees of Variable Annuities and Variable Life Insurance Contracts, the mortality expense charges, annuity or life insurance contract expenses, and all rider expenses for the measurement period will be added back to the account. This value will be used to compute performance calculations.
3. Measurement Period: The first measurement period is defined as the first complete 4 calendar quarters plus the remainder of the calendar quarter in which Adviser accepts the account (calendar quarters are Jan.-Mar., Apr.-June, July-Sept., and Oct.-Dec.). After the first measurement period each subsequent measurement period will consist of the next four calendar quarters. The performance portion of the fee will be calculated and billed after each measurement period. If there is no excess return during any measurement period, no performance fee will be due.
4. Total Fee: The fixed fee portion plus the performance fee portion. Typically, incentive fee relationships provide an advisor with an incentive to favor accounts for which the adviser receives a performance based fee. However, Atlas Capital manages these accounts in the same manner and according to the same strategies as non-performance based accounts.

Performance vs. the S&P 500 Index Fee Schedule
Performance Fee: 1/3 of the total return of the account that is in excess of the return of the Standard & Poor’s 500 Index during the measurement period. Adviser will determine the return of the S&P 500 Index by the difference in the value of the index (as reported in the Wall Street Journal or similar financial publication) at the start of each measurement period and at the end of each measurement period. Dividends on the S&P Index are not included in this computation. In order to compute the performance fees of Variable Annuities and Variable Life Insurance Contracts, the mortality expense charges, annuity or life insurance contract expenses, and all rider expenses for the measurement period will be added back to the ending account value. This value will be used to compute performance calculations. 1. This difference (positive or negative) will then be computed as percentage gain or loss for the measurement period. 2. Measurement Period: The first measurement period is defined as the first complete 4 calendar quarters plus the remainder of the calendar quarter in which Adviser accepts the account (calendar quarters are Jan.-Mar., Apr.-June, July-Sept., and Oct.-Dec.). If there is no excess return during any measurement period, no performance fee will be due. Note: There may be occasions when Adviser will be entitled to a performance fee when the Client’s account has shown a negative return during the measurement period. That is, the Client’s account has declined less than the S&P 500 during the measurement period. The Client, by execution and dating of an Investment Management Agreement on the separate Performance Fee execution line on the execution page hereof, acknowledges, understands, and represents to Adviser that: (1) he/she/it is an "qualified" Client as defined immediately above; (2) that Adviser is relying upon such representation for compliance with Rule 205-3; (3) that he/she/it shall immediately notify Adviser in writing if his/her/its financial situation negatively changes so as to no longer qualify as an "qualified" Client in accordance with the aforementioned Rule 205-3; and, (4) that the Performance Fee may be an incentive for the Adviser to make investments that are riskier or more speculative than would be the case absent a Performance Fee. Typically, incentive fee relationships provide an advisor with an incentive to favor accounts for which the adviser receives a performance-based fee. However, Atlas Capital manages these accounts in the same manner and according to the same strategies as non-performance based accounts.

Item 7 Types of Clients

Description
Atlas Capital generally provides investment advice to individuals, families, pensions, profit sharing plans, trusts and estates. Advice may extend to entities related to the client such as small businesses and charitable organizations, including foundations and endowments. Client relationships vary in scope and length of service. Atlas Capital does not impose a minimum dollar value of assets or other conditions for opening or maintaining an account.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis, Sources of Information, and Investment Strategies
Atlas Capital security analysis methods include charting and technical analysis. Atlas uses daily pricing data from various vendors and a variety of computer programs to determine the investments in it various strategies. The sources of information Atlas Capital uses include: financial newspapers and magazines, research materials prepared by others, corporate rating services, timing services, company press releases and a number of electronic data vendors to obtain daily prices of mutual funds, ETF's, stocks and subaccounts of Variable Annuity and Variable Life Products. When client has elected Atlas Capital manage their assets within a Variable Annuity policy, Variable Universal Life policy or corporate retirement account Atlas is restricted to only the investment options offered within that account or policy.

Investment Strategies
Atlas Capital offers several Investment strategies to clients. Primarily we use actively managed portfolios encompassing mutual funds, exchange traded funds or money market funds. The investment strategy or strategies for a specific client are based on the client's election of a strategy or strategies on the Management Strategy Instruction Form. For accounts where the client has selected multiple strategies, Atlas may, at its discretion, rebalance the strategies in a client's account to reflect the client's most recent elections on the Management Strategy Selection Form.

Inverse or Enhanced Market Strategies
Atlas may utilize long and short mutual funds and/or exchange traded funds that are designed to perform an: (1) Inverse relationship to certain market indices (at a rate of 1 or more time the inverse [opposite] result of the corresponding index) as an investment strategy and /or for the purpose of hedging against downside market risk; and (2) enhanced relationship to certain market indices (at a rate of 1 or more times the actual result of the corresponding index) as an investment strategy and/or for the purpose of increasing gains in an advancing market. There can be no assurance that any such strategy will prove profitable or successful. In light of these enhanced risks/rewards, a client may direct Atlas, in writing not to employ any or all such strategies for his/her/their/its accounts.

Investment Recommendation regarding certain Atlas Capital Strategies
It is the recommendation of Atlas Capital to limit client's investing no more than 50% of their investable net worth in the strategies that may use leveraged, inverse, gold, silver, precious metals or oil funds as investment options.

Biblically Responsible Investing Strategies and Limitations
Certain clients desire to invest all, or a portion, of their investment portfolio in biblically responsible securities (i.e. companies whose businesses do not involve production or sale of such products as

alcohol, tobacco, firearms, contraceptives, etc.). The number of such companies are limited (including mutual funds and exchange traded funds that limit investment to such securities) when compared to the broad market of publicly traded companies and funds. As such, the diversification of the client's portfolio will correspondingly be adversely affected, as well as potential for portfolio underperformance. A client that desires such strategy must accept the above limitations. Information on the BRI strategies begins on Page 25.

BRIEF DESCRIPTIONS OF THE CORE STRATEGIES INCLUDED BELOW:

Aviator Strategy

The Atlas Capital Aviator Strategy is a Long/Short/Cash strategy that uses multiple indicators and takes a macro approach to equity investing by asking first, "do we want to be invested in equities at this time?" If the composite of the indicators answer "Yes", the Aviator Strategy positions 100% of the assets in a fund that is designed to provide 2X the movement of the NASDAQ 100. If the composite of indicators is negative, the Aviator Strategy positions 100% of the assets in a fund that is designed to provide the inverse 2X of the NASDAQ 100. When the indicators are neutral, assets are held in a money market fund. Depending upon the indicators, the Aviator Strategy could be invested 100% in a fund designed to provide 2X the return of the NASDAQ 100, 100% in a fund designed to provide the inverse 2X the return of the NASDAQ 100, or 100% in a money market fund. The Aviator is a very active strategy and generally trades quite frequently. Because the Aviator Strategy uses 2X (leveraged) funds, high draw downs and high standard deviations are to be expected. Exchange Traded Funds, and/or funds from the Rydex and the ProFunds families (or similar families or funds that provide unrestricted, no-cost exchange privileges) are considered investment options. The Aviator Strategy may not be suitable for all investors and should only be a portion of an investment portfolio. Remember past performance is not indicative of future results.

Crescendo Strategy

The Atlas Capital Crescendo Strategy is a Long/Short/Cash strategy that uses multiple indicators and takes a macro approach to equity investing by asking first, "do we want to be invested in equities at this time?" If the composite of the indicators answer "Yes", the next question becomes "Which investment style or styles appear to have the greatest opportunity for appreciation and how much equity exposure do we want?" The Crescendo Strategy uses investment options that are designed to provide 2X the movement of the NASDAQ 100 and/or the Russell 2000 when the answer is 'Yes". If the composite of the indicators answer "No", the Crescendo Strategy uses investment options that are designed to provide the inverse 2X of the NASDAQ 100 and/or the Russell 2000. The Crescendo Strategy is designed to move in and out of positions in "incremental steps" as opposed to 100% movement in or out of positions. When the indicators are neutral, assets are held in a money market fund. Depending upon the indicators, the Crescendo Strategy could be invested 100% in a fund designed to provide 2X the return, positive or negative, of the NASDAQ 100, 100% in a fund designed to provide 2X the return, positive or negative, of the Russell 2000, a combination of the two, 100% in a money market fund, or invested in various percentages of all options. The Crescendo is a very active strategy and generally trades quite frequently. Because the Crescendo Strategy uses 2X (leveraged) funds, high draw downs and high standard deviations are to be expected. Exchange Traded Funds, and/or funds from the Rydex and the ProFunds families (or similar families or funds that provide unrestricted, no-cost exchange privileges) are considered investment options. The Crescendo Strategy may not be suitable for all investors and should only be a portion of an investment portfolio. Remember past performance is not indicative of future results.

Classic Strategy
The Atlas Capital Classic Strategy is an active investment approach that takes a macro approach to equity investing by asking first, "Do we want to be invested in equities at this time?" If our proprietary indicators answer "Yes," the next question becomes "Which investment style or styles appear to have the greatest opportunity for appreciation?" This investment philosophy helps keep you invested in the market for the long term. The strategy's goal is to outperform the broad market indices over a full market cycle. Depending upon market conditions the Classic Strategy could be 100% invested in one investment style, diversified among styles, or 100% money market. The ability to move to a 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns you have additional leverage over a buy-and hold position when the market turns back up. Through the Classic Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the selected investments maintain an appropriately high ranking, they are held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. All U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Classic Long/Short Strategy
The Atlas Capital Long/Short Classic Strategy takes a macro approach to equity investing by asking first, "Do we want to be invested in equities at this time?" If our proprietary indicators answer "Yes," the next question becomes "Which investment style appears to have the greatest opportunity for appreciation, Large Cap, Small Cap, NASDAQ 100? Then invest 100% of the assets in that investment class. However when the answer is "No" assets are moved 100% to an inverse fund that would represent the weakest of the Large Cap, Small Cap, or NASDAQ 100 asset classes. Whether the answer is "Yes" or "No" Atlas constantly monitors the asset classes and makes exchanges in the investment positions as the strategy indicates. The goal of the Long/Short Classic strategy is to be in the strongest asset class when the answer is "Yes" and in the inverse fund of the weakest sector when the answer is "No". All U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results. The Atlas Capital Classic Long/Short Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Quest Strategy
The Atlas Capital Quest Strategy is an active investment approach that takes a macro approach to equity investing by asking first, "Do we want to be invested in equities at this time?" If our proprietary indicators answer "Yes," the next question becomes "Which investment style or styles appear to have the greatest opportunity for appreciation?" This investment philosophy helps keep you invested in the market for the long term. The strategy's goal is to outperform the broad market indices over a full market cycle. Depending upon market conditions the Quest Strategy could be 100% invested in one investment style, diversified among styles, or 100% money market. The ability to move to 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns, you have additional leverage over a buy-and-hold position when the market turns back up. Through the Quest Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the selected investments maintain an appropriately high ranking, they are held in the client's

portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. All U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Rotational All Funds Growth Strategy

The Atlas Capital Rotational AFG Strategy is an active investment approach that distributes assets among different asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency of asset classes, as well as broad market segments such as growth and value stocks, to excel at different times in the economic cycles. Through this strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions and position client assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and is mutually exclusive of each other. Utilizing these several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions the Rotational All Funds Growth Strategy could achieve market exposure as great as 100% invested in one equity style, 100% invested in fixed income instruments, diversified among asset classes, or have zero equity exposure and 100% invested in money market instruments. The ability to move to a 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. All mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Rotational Equity Growth Strategy

The Atlas Capital Equity Growth Strategy is an active investment approach that distributes assets among different asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency of asset classes as well as broad market segments, such as growth and value stocks, to excel at different times in the economic cycles. Through the Rotational Equity Growth Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and each is mutually exclusive of the other. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions the Rotational Equity Growth Strategy could achieve market exposure as great as 100% invested in one equity style, diversified among asset classes, or have zero equity exposure, and 100% invested in money market instruments. The ability to move to a 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. All U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

High Yield Strategy
The Atlas Capital High Yield Strategy shifts client assets among High Yield investments and money market accounts. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The goal of the strategy is to provide investors with better returns than could be achieved from owning the high yield debt class solely with less risk, over a full interest rate cycle. Depending upon market conditions the High Yield Strategy could be 100% invested in High Yield investments; likewise could be 100% invested in money market investments. All mutual funds and exchange traded funds that primarily invest in high yield securities are considered investment options. The ability to move to a 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns, you have additional leverage over a buy-and-hold position when the market turns back up. Remember past performance is not indicative of future results.

High Yield Long/Short Strategy
The Atlas Capital High Yield Long/Short Strategy shifts clients assets among High Yield mutual funds or exchange traded funds (ETF's) when the model is positive and mutual funds or exchange traded funds that seek to provide investment results that correspond generally to the inverse of the total return high yield market consistent with maintaining reasonable liquidity when the model is negative. The Atlas Capital Long/Short High Yield Strategy is available within selected custodians and not available within Variable Annuity and Variable Universal Life accounts. The strategy's goal is to outperform the general High Yield market of a full market cycle. All mutual funds and exchange traded funds that primarily invest in high yield securities are considered investment options. Remember past performance is not indicative of future results. The Atlas Capital High Yield Long/Short Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Fixed Income Strategy
The Atlas Capital Fixed Income Strategy shifts client assets among fixed income investments that concentrate on money market, short and long-term U.S. treasury bonds, international bonds, corporate bonds, emerging markets bonds, floating rate bonds and high yield bonds. Mutual funds and exchange traded funds are considered investment options. The goal of the strategy is to provide investors with better returns than could be achieved from owning any one of the various debt classes alone with less risk, over a full interest rate cycle. Atlas is not attempting to forecast the market, but to align client assets with existing market trends striving to identify which fixed income asset class or classes are performing in the current marketplace and allocate accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a portion of the client's account and each is mutually exclusive of the other. Utilizing these several indicators allows the possibility to exploit each indicators strengths and cover their weaknesses in the current interest rate cycle. Remember past performance is no guarantee of future results; however, anytime you reduce the impact of market downturns, you have additional leverage over a buy-and-hold position when the market turns back up. Investment decisions are based on Atlas' proprietary indicators. The Fixed Income Strategy does not attempt to forecast the market, but to align client assets with existing market trends. Depending upon market conditions the Fixed Income Strategy could be 100% invested in one income style, diversified among styles, or 100% money market. The ability to move to 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline.

Elite Strategy

Effective 04/01/2019 Atlas Capital will not accept new accounts for this investment strategy. Existing accounts will be allowed to continue using the Elite Strategy.

The Atlas Capital Elite Strategy evaluates the various Atlas managed strategies and distributes client assets amongst them at the discretion of Atlas Capital based on current market developments. The distribution is adjusted on a regular basis in response to market and economic conditions, based on the proprietary Atlas managed strategies. The Elite strategy capitalizes on the tendency of managed strategies to excel in different market segments within a market cycle. This investment philosophy helps keep you invested in the market for the long term. The strategy's goal is to outperform the broad market indices over a full market cycle. Depending upon market conditions the Elite strategy could achieve equity market exposure as great as 100%, bond exposure as great as 100%, diversified among asset classes, or have as little as zero equity exposure and 100% invested in money market instruments. All mutual funds and exchange traded funds are considered investment options. The ability to move to a 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns, you have additional leverage over a buy-and-hold position when the market turns back up. Remember past performance is not indicative of future results.

Perpetual Equity Growth

The Atlas Perpetual Equity Growth Strategy is an active investment approach that is continuously invested in the equity market and distributes assets among different investment styles or asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency classes as well as broad market segments, such as growth and value stocks, to excel at different times in the economic cycles. Likewise the performance difference between the large capitalization asset class and the small capitalization asset class can be dramatic under certain market conditions. Through the Perpetual Equity Growth Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and each is mutually exclusive of the other. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions the Perpetual Equity Growth Strategy could be invested in one equity style or diversified among asset classes. All U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Perpetual World Equity Growth

The Atlas Perpetual World Equity Growth Strategy is an active investment approach that is continuously invested in the equity markets, United States and/or International, and distributes assets among different investment styles or asset classes within the marketplace. International options may include, but not limited to, World, European, Far East, Latin America, and Emerging Markets. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency of asset classes as well as broad market segments, such as growth and value stocks, to excel at different times in the economic cycles. For example, the performance difference between the large capitalization asset class and the small

capitalization asset class can be dramatic under certain market conditions. Likewise, there are times that investing in the International markets offers greater opportunities for gains than the United States markets. Through the Perpetual World Equity Growth Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions and to position client's assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and each is mutually exclusive of the other. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators' selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions, the Perpetual World Equity Growth Strategy could be invested in one equity asset class or diversified among asset classes. This strategy could be 100% invested in the United States markets, 100% internationally, or a combination, depending upon market conditions. All equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Alternative Strategy

The Atlas Capital Alternative Strategy takes a non-traditional approach to investment selections. The Alternative strategy selects funds or ETF's encompassing a variety of investment objectives that are considered non-traditional, i.e. they do not conform to the large, mid or small cap, growth or value objective funds. The investment options considered for use in alternative strategy are equity or exchange traded funds that have concentrated areas of investment selections. Some of the fund concentrations are, but not limited to, natural resources, precious metals, water, technology, energy, energy services, infrastructure, real estate, electronics, health care, communications and commodities. Both U. S. and global funds may be considered. The funds used in the strategy are exclusive of any other Atlas strategy. The goal is to provide opportunities for growth that are not normally found in the traditional selection of investments. Depending upon market conditions the Alternative Strategy could be 100% invested in one investment style, diversified among styles, or 100% money market. The ability to move to 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Because the investments within this strategy may be concentrated within very narrow areas of the market, the volatility and drawdowns may be greater than other Atlas Capital Management strategies. Remember past performance is not indicative of future results. The Atlas Capital Alternative Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Government Long/Short Bond Strategy

The Atlas Capital Long/Short Government Bond Strategy is a quantitatively based strategy that utilizes multiple uncorrelated tactical strategies and attempts to position assets to benefit from a rising or declining yield curve. The strategy shifts clients' assets between mutual funds or ETF's that have an objective of benefiting regardless of interest rates. This strategy may hold a money market fund. The funds used in this strategy seek monthly investment results, before fees and expenses, that match the monthly return of the most recently issued 30-year U.S. Treasury Bond for a month, either positive or negative. The funds selected may use leverage to magnify the daily return (positive and negative) of the most recent issued 30- year U.S. Treasury Bond. For example, if the fund selected has an objective of 1.35, it seeks to have a return of 135% of the return of the 30-year U.S. Treasury Bond over the same time period, before fees and expenses. A fund with an objective of 2.0 would seek to return 200% of the daily return of the U.S. Treasury Bond over the same time period, before fees and expenses. Funds with an objective greater than 1.0 or funds with an objective greater than -1.0 have the effect of increasing

gains when the model is correct and conversely, increasing losses when wrong. Depending upon market conditions, the strategy may be 100% invested in funds having an objective of 1.0, greater than 1.0, 100% invested in inverse funds with an objective of -1.0, greater than -1.0, 100% money market, or 50% invested in funds and 50% in money market funds. The strategy has been designed to be extremely active and may trade between 75 and 150 times per year. It is a very short term strategy where trades may be as short as only one day to a maximum of a few days. Clients may want to consider using this strategy within a tax deferred account for record keeping simplicity and to avoid any short term capital gains or losses. Clients are advised to use only a portion of their investable assets with this strategy as investing in funds that have an objective greater than 1.0 has the potential to magnify losses and possesses an above average risk. Funds with an objective of greater that 1.0 (leveraged funds) are not suitable for all investors because of the sophisticated techniques these funds employ. Leveraged funds entail certain risks, including risk associated with the use of derivatives (swap agreements, futures contracts and similar instruments), imperfect benchmark correlation, leverage and market price variance, all of which can increase volatility and decrease performance. This strategy can be best evaluated over a complete interest rate cycle which generally takes several years. Remember past performance is not indicative of future results. The Atlas Capital Government Long/Short Bond Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Gold Strategy

The Atlas Capital Gold Strategy is an active strategy that exchanges assets between a money market fund and in investment(s) (Mutual Fund or Exchange Traded Fund) that has an objective of mirroring the price of gold. When the Atlas gold model is positive, assets will be in one or more mutual funds and/or exchange traded funds whose objective is to mirror as closely as possible the performance of the price of gold. When the model is negative, the assets will be invested in a money market account. There are numerous factors that may affect the price of gold, including but not limited to: global gold supply and demand, which is influenced by such factors as forward selling by gold producers, purchases made by gold producers to unwind gold hedge positions, central bank purchases and sales, and production and cost levels in major gold-producing countries such as South Africa, the United States and Australia; global or regional political, economic or financial events and situations; investors' expectations with respect to the rate of inflation; currency exchange rates; interest rates; and investment and trading activities of hedge funds and commodity funds. There is no guarantee that any of the investments selected will be able to meet their objective of closely mirroring the actual price of gold. It is anticipated that none of the mutual funds or exchange traded funds will pay any dividends to holders. The Atlas Gold Strategy is an active strategy and gains or losses will likely be considered short-term for tax purposes. Because the investments within this strategy are 100% related to the price of gold, the volatility and drawdowns may be greater than other Atlas Capital Management strategies. Exchange traded funds, and/or funds from the Rydex and the ProFunds families (or similar families or funds that provide unrestricted, no-cost exchange privileges) are considered investment options. The Gold Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio. Remember past performance is not indicative of future results.

Silver Strategy

The Atlas Capital Silver Strategy is an active strategy that exchanges assets between a money market fund and in investment(s) (Mutual Fund or Exchange Traded Fund) that has an objective of mirroring the price of silver. When the Atlas Silver model is positive, assets will be in one or more mutual funds and/or exchange traded funds whose objective is to mirror as closely as possible the performance of the price of silver. When the model is negative, the assets will be invested in a money market account. There are numerous factors that may affect the price of silver, including but not limited to: global silver supply and

demand, which is influenced by such factors as forward selling by silver producers, purchases or sales made by silver producers to place or unwind silver hedge positions, a change in economic conditions, a significant change in the attitude of speculators and investors towards silver, and sales, production and cost levels in major silver producing countries; global or regional political, economic or financial events and situations; investors' expectations with respect to the rate of inflation; currency exchange rates; interest rates; and investment and trading activities of hedge funds and commodity funds. There is no guarantee that any of the investments selected will be able to meet their objective of closely mirroring the actual price of silver. It is anticipated that none of the mutual funds or exchange traded funds will pay any dividends to holders. The Atlas Silver Strategy is an active strategy and any gains or losses will be considered short-term for tax purposes. Because the investments within this strategy are 100% related to the price of silver, the volatility and drawdowns may be greater than other Atlas Capital Management strategies. Exchange traded funds, and/or funds from the Rydex and the ProFunds families (or similar families or funds that provide unrestricted, no-cost exchange privileges) are considered investment options. The Silver Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio. Remember past performance is not indicative of future results.

Precious Metals 1.0X Strategy

The Atlas Capital Precious Metals 1.0X Strategy is an active strategy that exchanges assets between a money market fund and the Rydex Precious Metals Investor Class Fund (trading symbol RYPMX). When the Atlas Capital Precious Metals model is positive the assets are invested in RYPMX and when the model is negative the assets are moved into a money market fund. The Rydex Precious Metals Investor Class Fund seeks to provide capital appreciation by investing in U.S. and foreign companies that are involved in the precious metals sector, including exploration, mining, production and development, and other precious metals-related services. The frequent exchanges permitted by RYPMX can decrease performance, increase expenses and cause investors to incur tax consequences. Investors are advised to please read the prospectus of all funds and consider the investment objectives, risks, charges, and expenses of all funds before investing. Additional information on RYPMX may be obtained by visiting www.guggenheiminvestments.com. The RYPMX fund is not considered a diversified fund as all of its investments are concentrated in the precious metals sector. Because of the concentration of investments in this fund, the fund should be considered to have above average risk and may have greater volatility and drawdowns than other Atlas Capital Management strategies. The Atlas Capital Precious Metals 1.0X Strategy is an active strategy and gains or losses will likely be considered short-term for tax purposes. Remember past performance is not indicative of future results. The Atlas Capital Precious Metals 1.0X Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Precious Metals 1.5X Strategy

The Atlas Capital ProFunds Precious Metals 1.5X Strategy is an active strategy that exchanges assets between a money market fund and the ProFunds Precious Metals UltraSector Investor Class Fund (trading symbol PMPIX). When the Atlas Precious Metals 1.5X model is positive the assets are invested in PMPIX and when the model is negative the assets are moved into a money market fund. The ProFunds Precious Metals UltraSector Fund seeks to provide a daily return, before fees and expenses, that is 150% of the return of the Dow Jones U.S. Precious Metals Index (benchmark)(the "Index") for a single day. The Index measures the performance of the precious metals mining sector. Component companies of the index include, among others, leading miners and producers of gold, silver and platinum-group metals whose securities are available to U.S. investors during U.S. trading hours. It is a float-adjusted, market capitalization weighted index. It is not possible to invest directly in an index. Any

fund that has an objective of greater that 100% of its benchmark is considered a leveraged fund. Funds that seek a return objective greater that 100% of the Index have the potential to magnify the returns, both on the upside and downside. Leveraged funds entail certain risks, including risk associated with the use of derivatives (swap agreements, futures contracts and similar instruments), imperfect benchmark correlation, leverage and market price variance, all of which can increase volatility and decrease performance. For more on correlation, leverage and other risks, investors are advised to please read the prospectus of all funds under consideration. Additional information on ProFunds Precious Metals Ultra Sector Fund along with additional information on leveraged funds may be obtained by visiting www.profunds.com. Leveraged funds are subject to active investor risk, and there may be no restrictions on the size and frequency of trades. The frequent exchanges permitted by most leveraged funds can decrease performance, increase expenses and cause investors to incur tax consequences. Investors are advised to consider the investment objectives, risks, charges, and expenses of all funds before investing. The ProFunds Precious Metals UltraSector Investor Class Fund is not a diversified fund as all of its investments are concentrated in the precious metals sector. Because of the concentration of investments in this fund, the fund should be considered to have above average risk and may have greater volatility and drawdowns than other Atlas Capital Management strategies. The Atlas Capital Precious Metals 1.5X Strategy is an active strategy and gains or losses will likely be considered short-term for tax purposes. Remember past performance is not indicative of future results. The Atlas Capital Precious Metals 1.5X Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Precious Metals Long 1.0X / Short -1.0X Strategy

The Atlas Capital Precious Metals Long 1.0X / Short -1.0X Strategy is an active strategy that exchanges assets between the Rydex Precious Metals Investor Class Fund (trading symbol RYPMX) and the ProFunds Short Precious Metals Investor Class Fund (trading symbol SPPIX). When the Atlas Capital Precious Metals Long 1.0X / Short -1.0X model is positive the assets are invested in RYPMX and when the model is negative the assets are moved to SPPIX (an inverse fund). The Rydex Precious Metals Investor Class Fund seeks to provide capital appreciation by investing in U.S. and foreign companies that are involved the precious metals sector, including exploration, mining, production and development, and other precious metals-related services. The ProFunds Short Precious Metals Investor Class Fund seeks daily investment results, before fees and expenses, that are 100% inverse (opposite) the return of the Dow Jones U.S. Precious Metals Index (the benchmark)(the “index”) for a single day. Inverse funds seek to rise on days when their benchmarks fall or vice versa. The Index measures the performance of the precious metals mining sector. Component companies include, among others, leading miners and producers of gold, silver and platinum-group metals whose securities are available to U.S. investors during U.S. trading hours. It is a float-adjusted, market capitalization weighted index. It is not possible to invest directly in an index. The frequent exchanges permitted by the RYPMX and SPPIX can decrease performance, increase expenses and cause investors to incur tax consequences. Investors are advised to please read the prospectus of all funds under consideration and consider the investment objectives, risks, charges, and expenses of all funds before investing. Additional information on RYPMX and SPPIX may be obtained by visiting www.guggenheiminvestments.com and www.profunds.com. The Rydex Precious Metals Investor Class Fund and the ProFunds Short Precious Metals Investor Class Fund are not considered diversified funds as all of their investments are concentrated in the precious metals sector. Because of the concentration of investments in these funds, the funds should be considered to have above average risk and may have greater volatility and drawdowns than other Atlas Capital Management strategies. The Atlas Capital Precious Metals Long 1.0X / Short -1.0X Strategy is an active strategy and gains or losses will likely be considered short-term for tax purposes. Remember past

performance is not indicative of future results. The Atlas Capital Precious Metals Long 1.0X / Short -1.0X Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Precious Metals Long 1.5X / Short -1.0X Strategy

The Atlas Capital Precious Metals Long 1.5X / Short -1.0X Strategy (Long 1.5X / Short -1.0X") is an active strategy that exchanges assets between the ProFunds Precious Metals UltraSector Investor Class Fund (trading symbol PMPIX) and the ProFunds Short Precious Metals Investor Class Fund (trading symbol SPPIX). When the Long 1.5X / Short -1.0X model is positive the assets are invested in PMPIX (a leveraged fund) and when the model is negative the assets are moved to SPPIX (an inverse fund). The ProFunds Precious Metals UltraSector Fund seeks to provide a daily return, before fees and expenses, that is 150% of the return of the Dow Jones U.S. Precious Metals Index (benchmark) (the "Index") for a single day. The ProFunds Short Precious Metals Fund seeks daily investment results, before fees and expenses, that are 100% inverse (opposite) the Index for a single day. Inverse funds seek to rise on days when their benchmarks fall or vice versa. The Index's objective is to represent the performance of US trading stocks in precious metals exploration and production. Component companies include, among others, leading miners and producers of gold, silver and platinum-group metals whose securities are available to U.S. investors during U.S. trading hours. It is a float-adjusted, market capitalization weighted index. It is not possible to invest directly in an index. Any fund that has an objective of greater that 100% of its benchmark is considered a leveraged fund. Funds that seek a return objective greater that 100% of the Index have the potential to magnify the returns, both on the upside and downside. Leveraged funds entail certain risks, including risk associated with the use of derivatives (swap agreements, futures contracts and similar instruments), imperfect benchmark correlation, leverage and market price variance, all of which can increase volatility and decrease performance. For more on correlation, leverage and other risks, investors are advised to please read the prospectus of all funds under consideration. Additional information on PMPIX and SPPIX may be obtained by visiting www.guggenheiminvestments.com and www.profunds.com. Leveraged funds are subject to active investor risk, and there may be no restrictions on the size and frequency of trades. The frequent exchanges permitted by most leveraged and inverse funds can decrease performance, increase expenses and cause investors to incur tax consequences. Investors are advised to consider the investment objectives, risks, charges, and expenses of all funds before investing. ProFunds Precious Metals UltraSector Investor Class Fund and the ProFunds Short Precious Metals Investor Class Fund are not considered diversified funds as all of their investments are concentrated in the precious metals sector. Because of the concentration of investments in these funds, the funds should be considered to have above average risk and may have greater volatility and drawdowns than other Atlas Capital Management strategies. The Atlas Capital Precious Metals Long 1.5X / Short -1.0X Strategy is an active strategy and gains or losses will likely be considered short-term for tax purposes. Remember past performance is not indicative of future results. The Atlas Capital Precious Metals Long 1.5X / Short -1.0X Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Oil Strategy

The Atlas Capital Oil Strategy is an active strategy that exchanges assets between a money market fund and the United States Oil Fund (USO), an exchange traded fund that trades on the NYSE Arca stock exchange. When the Atlas Capital Oil Model is positive the assets are invested in the United States Oil Fund and when the model is negative the assets are moved into a money market fund. USO is an exchange-traded security designed to track the daily price movements of West Texas Intermediate ("WTI") light, sweet crude oil. The investment objective of the United States Oil Fund is for the daily

changes in percentage terms of its shares' net asset value ("NAV") to reflect the daily changes in percentage terms of the spot price of light, sweet crude oil delivered to Cushing, Oklahoma, as measured by the daily changes in price of a specified short-term futures contract on light, sweet oil called the "Benchmark Oil Futures Contract," less USO's expenses. The Benchmark Oil Futures Contract is the futures contract on light, sweet crude oil as traded on the New York Mercantile Exchange (the "NYMEX") that is the near month contract to expire, except when the near month contract is within two weeks of expiration the Benchmark will be the next month contract to expire. Benchmarks and indexes cannot be invested in directly. The crude oil contract is WTI light, sweet crude oil delivered to Cushing, Oklahoma. USO invests primarily in listed crude oil futures contracts and other oil related futures contracts, and may invest in forwards and swap contracts. These investments will be collateralized by cash, cash equivalents, and U.S. government obligations with remaining maturities of two years or less. Investments in USO contain numerous risks, such as but not limited to, contract risk, counter party risk, correlation to benchmark, tax risk as USO is organized and operated as a limited partnership which has more complex tax treatment than conventional mutual funds. Investing in USO will result in clients receiving a K-1. Additional information may be found at www.uscfinvestments.com/k1-information. These risks and others are more fully described in USO's prospectus that investors are advised to read before selecting the Atlas Capital Oil Strategy. Investors are advised to consider the investment objectives, risks, charges, and expenses of all funds before investing. Additional information on USO may be obtained by visiting www.usffinvestments.com/uso. The United States Oil Fund is not considered a diversified fund as all of its investments are concentrated in the oil sector. The Atlas Capital Oil Strategy is an active strategy and gains or losses will likely be considered short-term for tax purposes. Because of the concentration of investments in this fund, the fund should be considered to have above average risk and may have greater volatility and drawdowns than other Atlas Capital Management strategies. Remember past performance is not indicative of future results. The Atlas Capital Oil Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Elevation Strategy

The Atlas Capital Elevation Strategy is a long-term, growth strategy designed for investors seeking a risk-managed, tax-sensitive portfolio approach with the goal of producing gains that would qualify as long-term for tax purposes, while seeking to avoid the majority of the markets major downturns like those that occurred in 2000-2002 and 2007-2009. In 1999 Morgan Stanley Capital International (MSCI) and Standard & Poor's Global (SPG) developed the Global Industry Classification Standard (GICS), seeking to offer an efficient investment tool to capture the breadth, depth and evolution of industry sectors. As of 12/3/2018 the GICS consisted of 11 sectors, 24 industry groups, 69 industries and finally 158 sub-industries. The GICS provides the industry classification for more than 26,000 active companies and 29,000 securities worldwide, comprising approximately 95% of the world's equity market capitalization. MSCI and SPG may from time to time alter the makeup of the various components of the GICS. The Elevation Strategy focuses on the "technical health" of the sub-industry groups on a weekly basis in order to provide a reading on the "state of the market". Each sub-industry group is rated as positive, negative, or neutral based on a variety of proprietary indicators. When the required percentage of the groups are rated positive (e.g. "technically healthy"), the Elevation Strategy will be invested in one or a combination of mutual funds or exchange traded funds (ETFs) that have an objective of mirroring the returns of the S&P 500 index, the Nasdaq 100 index, the Russell 2000 index, or the Morgan Stanley Capital International Europe, Australasia and Far East index (MSCI EAFE). This allocation is considered the core holdings of the Elevation Strategy and these positions are designed to be held until the state of the market is considered negative. When the state of the market is considered extremely positive (e.g. "extremely technically healthy"), Atlas Capital may, at its discretion, move a small portion of the account into mutual funds or ETFs that are designed to provide 2X the return of the S&P 500, 2X the return of

the Nasdaq 100 Index, 2X the return of the Russell 2000, 2X the return of the MSCI EAFE or a combination thereof. This is done to potentially enhance the return of the account. When the state of the market reverts to positive from extremely positive, the 2X investments are sold and the proceeds are reinvested in the core holdings. When the required percentage of the sub-industry groups are rated negative (e.g. "technically not healthy"), the strategy moves 100% to capital preservation mode (i.e. money market fund). When the state of the market moves from negative to positive, the assets are reinvested in one or more of the core holdings. Remember past performance is not indicative of future results. The Atlas Capital Elevation Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Elevation Plus Strategy

This strategy is currently not available to new or existing accounts. We anticipate this strategy will be available to investors sometime in 2020. The Atlas Capital Elevation Plus Strategy is a long-term, growth strategy designed for investors seeking a risk-managed, tax-sensitive portfolio approach with the goal of producing gains that would qualify as long-term for tax purposes, while seeking to avoid the majority of the markets major downturns like those that occurred in 2000-2002 and 2007-2009. In 1999 Morgan Stanley Capital International (MSCI) and Standard & Poor's Global (SPG) developed the Global Industry Classification Standard (GICS), seeking to offer an efficient investment tool to capture the breadth, depth and evolution of industry sectors. As of 12/3/2018 the GICS consisted of 11 sectors, 24 industry groups, 69 industries and finally 158 sub-industries. The GICS provides the industry classification for more than 26,000 active companies and 29,000 securities worldwide, comprising approximately 95% of the world's equity market capitalization. MSCI and SPG may from time to time alter the makeup of the various components of the GICS. The Elevation Plus Strategy focuses on the "technical health" of the sub-industry groups on a weekly basis in order to provide a reading on the "state of the market". Each sub-industry group is rated as positive, negative, or neutral based on a variety of proprietary indicators. When the required percentage of the groups are rated positive (e.g. "technically healthy"), the Elevation Plus Strategy will be invested in one or a combination of mutual funds or exchange traded funds (ETFs) that have an objective of mirroring the returns of the S & P 500 index, the Nasdaq 100 index, the Russell 2000 index, or the Morgan Stanley Capital International Europe, Australasia and Far East index (MSCI EAFE). This allocation is considered the core holdings of the Elevation Plus Strategy and these positions are designed to be held until the state of the market is considered negative. When the state of the market is considered extremely positive (e.g. "extremely technically healthy"), Atlas Capital may, at its discretion, employ margin to potentially enhance the return. Using margin, the account would purchase additional positions in funds or ETFs that have an objective of 2X the return of the S &P 500, 2X the return of the Nasdaq 100 Index, 2X the return of the Russell 2000, or 2X the MSCI EAFE or a combination thereof. When the state of the market reverts to positive from extremely positive, the 2X investments are sold and the margined positions closed and the proceeds are reinvested in the core holdings. When the required percentage of the sub-industry groups are rated negative (e.g. "technically not healthy"), the strategy moves 100% to capital preservation mode (i.e. money market fund). When the state of the market moves from negative to positive, the assets are reinvested in one or more of the core holdings. Remember past performance is not indicative of future results. The Atlas Elevation Plus Strategy may not be suitable for all investors and should only be a small portion of an investment portfolio.

Municipal Bond High Yield Fixed Income Strategy

The primary objective of the Municipal Bond High Yield Fixed Income strategy is to provide income that is free from personal federal income tax with a secondary objective of capital gains. The strategy shifts client assets among a select group of mutual funds and/or ETFs that have objectives of providing income that is free from personal federal income taxes. The strategy may also invest in money market funds.

The goal of the strategy is to provide investors with better returns than could be achieved from owning and holding high yield municipal bonds over a full interest rate cycle. The average quality rating of the bonds held in the mutual funds and/or ETFs generally have a Standard & Poors rating of BB or a Moodys rating of Ba. The BB and Ba ratings are generally considered one level below investment grade. Some of the funds selected may elect to use leverage in the management of their respective funds. For clients who earn high levels of ordinary taxable income, the income produced by the municipal bond strategy could be subject to the Alternative Minimum Tax (AMT). Atlas is not attempting to forecast the market but to align client assets with existing market trends. Investments in the target universe are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a portion of the client's account and each is mutually exclusive of the other. Utilizing these several indicators allows the possibility to exploit each indicator's strengths and cover their weaknesses during an interest rate cycle. Anytime you reduce the impact of market downturns, you have leverage over a buy-and-hold position when the market turns back up. Depending on market conditions the Atlas Capital Municipal Bond High Yield Fixed Income Strategy could be 100% in one fund/ETF, spread among several funds/ETFs, 100% money market or a combination of funds/ETFs and money market. The ability to move to a 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Remember past performance is not indicative of future results.

Bond Income Strategy

The primary objective of the Atlas Capital Bond Income Strategy is to provide income with a secondary objective of capital gains. The strategy shifts client assets among mutual funds and/or exchange traded funds investing in all types of income generating vehicles including, but not limited to, U.S. treasury bonds, international bonds, corporate bonds, emerging market bonds, floating rate bonds and high yield bonds. The strategy may also invest in money market funds. Atlas is not attempting to forecast the market but to align client assets with existing market trends. Investments in the target universe are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a portion of the client's account and each is mutually exclusive of the other. Utilizing these several indicators allows the possibility to exploit each indicator's strengths and cover their weaknesses during an interest rate cycle. Anytime you reduce the impact of market downturns, you have leverage over a buy-and-hold position when the market turns back up. Depending on market conditions the Atlas Capital Bond Income Strategy could be 100% invested in one sector of the bond market, diversified among multiple sectors, combination of bond funds and money market, or 100% money market. The ability to move to 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Remember past performance is not indicative of future results.

Atlas' Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding the above core investment strategies.

Biblically Responsible Investing (BRI) Strategies

Biblically responsible investing/faith focused investing is interpreted in different ways. Some fund companies will not invest in businesses if they are publicly perceived to profit from immoral agendas or products such as alcohol, tobacco, firearms, contraceptives, etc. Others will not invest in companies that profit from immoral agendas even if it is not publicly known. Additionally, some mutual funds families add additional screens to also include finding if a business profits from and contributes to immoral agendas. It is important to note that fund families that invest in companies whose products and services are consistent with Christian values may eliminate securities or sectors that could have provided

superior results. These constraints could cause these funds to significantly underperform funds managed without these constraints. To reiterate, the number of biblically responsible companies and securities are limited when compared to the broad market of publicly traded companies and funds. As such, the diversification of the client's portfolio will correspondingly be adversely effected, as well as potential for portfolio underperformance. A client that desires biblically responsible/faith focused strategies must accept the above limitations. The most compelling reason to incorporate BRI strategies into an overall investment portfolio is to reflect an investor's values. Atlas offers clients the option of participating in Atlas Capital Management's "Sharing Program". This program allows clients to designate 10% of Atlas Capital's net advisory fees (after payment made to servicing adviser and any other parties) collected on the portion of their account invested in any or all of the BRI strategies to a single church or religious institution of their choice. The sharing program will not cause the underlying client to pay additional money or higher fees to compensate Atlas for the portion of its advisory paid to the designated organization. In order to qualify for the Atlas Capital Management Sharing Program, a client must be invested in one or more BRI strategies at the end of the calendar year. Fees will be determined by using the appropriate fee schedule, market value of the BRI strategies held in the client's account and length of time invested in the BRI strategies (see Fee Billing section on page 8 for more details). To participate in the plan a client needs to submit the Atlas Sharing Program Designation Form. Payment to the designated institution occurs annually, in arrears, on or about January 31st of the subsequent calendar year.

BRIEF DESCRIPTIONS OF THE BRI STRATEGIES INCLUDED BELOW:

Biblically Responsible (BRI) Bond Income Strategy

The primary objective of the Atlas Capital BRI Bond Income Strategy is to provide income with a secondary objective of capital gains. The strategy shifts client assets among BRI mutual funds and/or exchange traded funds investing in all types of income generating vehicles including, but not limited to, U.S. treasury bonds, international bonds, corporate bonds, emerging market bonds, floating rate bonds and high yield bonds. The strategy may also invest in money market funds. Atlas is not attempting to forecast the market but to align client assets with existing market trends. Investments in the target universe are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a portion of the client's account and each is mutually exclusive of the other. Utilizing these several indicators allows the possibility to exploit each indicator's strengths and cover their weaknesses during an interest rate cycle. Anytime you reduce the impact of market downturns, you have leverage over a buy-and-hold position when the market turns back up. Depending on market conditions the Atlas Capital BRI Bond Income Strategy could be 100% invested in one sector of the bond market, diversified among multiple sectors, combination of bond funds and money market, or 100% money market. The ability to move to 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) Classic Strategy

The Atlas Capital BRI Classic Strategy is an active investment approach that takes a macro approach to equity investing by asking first, "Do we want to be invested in equities at this time?" If our proprietary indicators answer "Yes," the next question becomes "Which investment style or styles appear to have the greatest opportunity for appreciation?" This investment philosophy helps keep you invested in the market for the long term. The strategy's goal is to outperform the broad market indices over a full market cycle. Depending upon market conditions the BRI Classic Strategy could be 100% invested in one investment style, diversified among styles, or 100% money market. The ability to move to 100% money

market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns you have additional leverage over a buy-and hold position when the market turns back up. Through the BRI Classic Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the selected investments maintain an appropriately high ranking, they are held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. All BRI U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) High Yield Strategy

The Atlas Capital BRI High Yield Strategy shifts client assets among BRI High Yield investments and money market accounts. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The goal of the strategy is to provide investors with better returns than could be achieved from owning the high yield debt class solely with less risk, over a full interest rate cycle. Depending upon market conditions the BRI High Yield Strategy could be 100% invested in High Yield investments, likewise could be 100% invested in money market. The ability to move to a 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns, you have additional leverage over a buy-and-hold position when the market turns back up. All BRI mutual funds and exchange traded funds that primarily invest in high yield securities are considered investment options. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) Quest Strategy

The Atlas Capital BRI Quest Strategy is an active investment approach takes a macro approach to equity investing by asking first, "Do we want to be invested in equities at this time?" If our proprietary indicators answer "Yes," the next question becomes "Which investment style or styles appear to have the greatest opportunity for appreciation?" This investment philosophy helps keep you invested in the market for the long term. The strategy's goal is to outperform the broad market indices over a full market cycle. Depending upon market conditions the BRI Quest Strategy could be 100% invested in one investment style, diversified among styles, or 100% money market. The ability to move to 100% money market position adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. Anytime you reduce the impact of market downturns, you have additional leverage over a buy-and-hold position when the market turns back up. Through the BRI Quest Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the selected investments maintain an appropriately high ranking, they are held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. All BRI U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) Rotational Equity Growth Strategy
The Atlas Capital BRI Equity Growth Strategy is an active investment approach that distributes assets among different asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency of asset classes as well as broad market segments, such as growth and value stocks, to excel at different times in the economic cycles. Through the BRI Rotational Equity Growth Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and each is mutually exclusive of the other. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions the BRI Rotational Equity Growth Strategy could achieve market exposure as great as 100% invested in one equity style, diversified among asset classes, or have zero equity exposure, and 100% invested in money market instruments. The ability to move to 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. All BRI U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) Rotational All Funds Growth Strategy
The Atlas Capital BRI Rotational All Funds Growth Strategy is an active investment approach that distributes assets among different asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency of asset classes, as well as broad market segments such as growth and value stocks, to excel at different times in the economic cycles. Through this strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions and position client assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and is mutually exclusive of each other. Utilizing these several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions the BRI Rotational All Funds Growth Strategy could achieve market exposure as great as 100% invested in one equity style, 100% invested in fixed income instruments, diversified among asset classes, or have zero equity exposure and 100% invested in money market instruments. The ability to move to 100% money market adds a layer of risk management that possibly could limit the decline of a portfolio during a serious market decline. All BRI mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) Perpetual Equity Growth
The Atlas Capital BRI Perpetual Equity Growth Strategy is an active investment approach that is continuously invested in the equity market and distributes assets among different investment styles or asset classes within the marketplace. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency classes as well as broad market segments, such as growth and value stocks,

to excel at different times in the economic cycles. Likewise the performance difference between the large capitalization asset class and the small capitalization asset class can be dramatic under certain market conditions. Through the BRI Perpetual Equity Growth Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions, and to position client assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and each is mutually exclusive of the other. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions the BRI Perpetual Equity Growth Strategy could be invested in one equity style or diversified among asset classes. All BRI U.S. equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Biblically Responsible (BRI) Perpetual World Equity Growth

The Atlas BRI Perpetual World Equity Growth Strategy is an active investment approach that is continuously invested in the equity markets, United States and/or International, and distributes assets among different investment styles or asset classes within the marketplace. International options may include, but not limited to, World, European, Far East, Latin America, and Emerging Markets. The distribution is adjusted on a continuing basis in response to market and economic conditions, based on the proprietary indicators Atlas has developed. The strategy capitalizes on the tendency of asset classes as well as broad market segments, such as growth and value stocks, to excel at different times in the economic cycles. For example, the performance difference between the large capitalization asset class and the small capitalization asset class can be dramatic under certain market conditions. Likewise, there are times that investing in the International markets offers greater opportunities for gains than the United States markets. Through the BRI Perpetual World Equity Growth Strategy, Atlas strives to identify asset classes and market segments with the best performance potential given current market conditions and to position client's assets accordingly. Selected investments, and those in the target universe, are constantly monitored and ranked using proprietary indicators developed by Atlas Capital. Each of the indicators controls a small portion of the client's account and each is mutually exclusive of the other. Utilizing several indicators allows the strategy the possibility to exploit strengths and cover weaknesses in the current market cycle. As long as the indicators' selected investment maintains an appropriately high ranking, it is held in the client's portfolio. When an investment falls out of a desired range, its assets are moved to a higher ranked position. Depending upon market conditions, the BRI Perpetual World Equity Growth Strategy could be invested in one equity asset class or diversified among asset classes. This strategy could be 100% invested in the United States markets, 100% internationally, or a combination, depending upon market conditions. All BRI equity mutual funds and exchange traded funds are considered investment options. Remember past performance is not indicative of future results.

Atlas' Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding the above Biblically Responsible investment strategies.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment strategies keep the risk of loss in mind. However, as with all investments, clients face investment risks including the following: Loss of Principal Risk, Interest Rate Risk, Market Risk, Inflation Risk, Currency Risk,

Reinvestment Risk, Business Risk, Liquidity Risk, and Financial Risk. Atlas Capital may enter into a consulting arrangement with selected clients where Atlas will provide non-discretionary recommendations. The client may accept, reject or modify these recommendations. Atlas will execute any recommendation accepted by the client.

Item 9 Disciplinary Information

Legal and Disciplinary

On October 16, 2017, Atlas executed a Consent Order with the Securities and Exchange Commission ("SEC"), which included the firm's consent to entry of an Order Instituting Administrative and Cease-and-Desist Proceedings, Making Findings, and Imposing Remedial Sanctions and a Cease-and-Desist Order. From 2012-2016, Atlas received numerous client referrals from an unaffiliated firm. The unaffiliated firm would typically recommend and open Service Class custodial accounts for clients, which accounts could only accept Service Class mutual fund share classes that paid 12b-1 compensation and shareholder service fees to the registered representatives of the unaffiliated referring firm. Because the type of account opened with the mutual fund distributor dictated the type of share class that could be purchased, the selection and opening of a particular account type by the referring firm was tantamount to the selection of a particular share class. Atlas had no authority or ability whatsoever to select or change the type of custodial account maintained by the client and, as a result, once a Service Class account was opened, Atlas had no authority or ability to select less expensive mutual fund share class options. As such, after a Service Class account was opened, Atlas invested the referred clients in the only share class available for such accounts: the Service Class mutual fund share class. Mutual fund share classes which pay 12b-1 and/or service fee compensation typically are subject to higher expense ratios than those which do not pay such compensation. Therefore, even though Atlas did not receive any portion of the 12b-1 compensation or service fees, and did not select the initial or ongoing Service Class account type, by investing the referred clients in such Service Class shares, Atlas did not inform clients or the unaffiliated firm of the advisability of utilizing a less expensive share class. As a result, the terms of the Consent Order include representations that Atlas willfully violated Section 206(2) of the Advisers Act of 1940, which prohibits "any transaction, practice, or course of business which operates as a fraud or deceit upon any client or prospective client," as well as Section 206(4) of the Act and Rule 206(4)(7) thereunder, which requires advisory firms to adopt and implement written policies and procedures reasonably designed to prevent violations of the Act and its rules, due to: (1) Atlas's failure to inform clients and the referring firm that the impacted clients were not invested in the least expensive mutual fund share classes, since the client and referring firm were the only parties who could select the custodial account type; and (2) the firm's failure to have compliance procedures which addressed the evaluation of annual fees or expenses associated with mutual fund share classes. Note that a "willful" violation does not require that Atlas be aware that it is in violation of the Advisers Act of 1940 or the rules promulgated thereunder. Pursuant to the Consent Order, Atlas agreed to cease and desist from committing or causing violations of the above referenced sections of the Advisers Act and the rules promulgated thereunder, was censured, and was subject to a civil money penalty in the amount of $80,000. On notification by the SEC, Atlas took immediate corrective action by ceasing to invest clients in the Service Class shares and by directing the unaffiliated firm to convert all Service Class accounts to account types that could support lower cost mutual fund share classes. Atlas has not invested any clients in Service Class shares since this time.

Item 10 Other Financial Industry Activities and Affiliations

ProfitScore Capital Management, Inc. ("PCM"). PCM is under contract with Adviser to provide buy and sell directions and trade executions for management of client accounts in Adviser's "Government Long/Short" strategy. Adviser pays PCM a signal fee equal to 25% of the net advisory fee received for the portion of all client accounts using this strategy. Adviser's payment of these fees does not cause clients to pay a higher management fee.

Adviser is under contract with E*Trade Advisor Services to provide portfolio management services through participation in the E*Trade Advisor Services Money Manager X-change (MMX) program. Adviser pays E*Trade Advisor Services an annual program fee of 10 (ten) basis points on assets under management. This fee is paid quarterly. Payment of these fees does not cause clients to pay a higher management fee.

Atlas may engage the services of unaffiliated and independent signal providers to provide buy and sell signals, research, or other information that we may use to manage a particular strategy. Such signal providers will not act as fiduciaries with respect to any client as they engaged to provide market-related services to the Adviser. In providing individualized investment advice, Atlas may invest a client's assets in accordance with the recommendations of one or more signal providers or may invest the account in any manner it deems appropriate based on the client's personal objectives. All fees incurred by the subscription to various signal providers is paid by Atlas (in the form of a flat fee and/or as a percentage of the fees generated within a particular program). Thus, a portion of the advisory fee paid by a client to Atlas may be used to compensate such third party. Paying such fees does not cause clients to pay a higher management fee.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics

This Code of Ethics applies to all employees of Atlas Capital Management Corp. Employees shall maintain the highest standards of professional conduct in their daily business representing Atlas Capital to the general public or fellow employees in the office, in the field or in any communications or correspondence. Employees shall comply with the laws and regulations of the United States and the state and local governments' jurisdiction over Atlas Capitals business activities. This includes all laws preventing the use of nonpublic information by any associated person. Employees shall also adhere to the regulations of all national and regional stock exchanges, the National Association of Securities Dealers and other self-regulatory entities. Employees shall not make statements that the employee knows or has reason to believe are inaccurate or misleading. If any publication attributes statements to an employee which the employee did not make and if such published statements can be expected to inform the publication promptly of its error. Employees shall in particular, avoid leading anyone to believe that views of future market price behavior reflect foreknowledge rather than estimates and projections subject to reexamination and, as circumstances may dictate, to change. Employees shall not accept compensation or gifts (other than those normally extended as a matter of business courtesy) if the acceptance of such compensation or gifts could be construed as being specifically intended as a special inducement or reward for taking a particular action in the financial markets on behalf of the employees or the employee's clients. All employees of Atlas Capital Management shall provide within 10 calendar days of the end of each calendar quarter, a complete statement of holdings and transactions

for all accounts in which the associated person has a financial interest, or control over. Furthermore, each account must state the name of the firm through which the transactions were effected. When an employee comes to the conclusion or becomes aware that Atlas Capital has come to the conclusion that security should be bought or sold for a client or clients, the employee and the employees' immediate family shall not act on such conclusion before action is taken on behalf of Atlas Capital's clients. For the purchase, sale, or exchange of the shares of open-end mutual funds it is permissible for the share of employee's accounts to be transacted at the same time as clients. Employees shall offer undivided fidelity and loyalty to the legitimate interest of Atlas Capital and Atlas Capital's clients. Employees shall keep in complete confidence knowledge concerning the private affairs of Atlas Capital's clients and information contained in Atlas Capital's client records unless compelled to disclose such information by applicable law. Employees shall make every effort to maintain the highest degree of accuracy in all client records. Employees shall present information about investment performance only in compliance with applicable laws and regulations. Performance shall not be presented in a manner that may lead anyone to believe that past performance is an indication of future performance or risk. Participation or Interest in Client Transactions Atlas Capital and its employees may at times buy or sell securities that are also held by clients. Employees may not trade their own securities ahead of client trades. Employees comply with the provisions of the Atlas Capital "Policies & Procedures Manual". The Chief Compliance Officer of Atlas Capital Management is Jerry L. Jacobs. Jerry reviews all employee trades each quarter. His personal trades are reviewed by Joshua A. Kneller, Senior Vice President. The personal trading reviews ensure that the personal trading of employees was not based on inside information and that clients of the firm receive preferential treatment. Atlas offers proprietary strategies built with its trade signals and strategies created using trade signals from independent signal providers. This creates a financial incentive to recommend its own strategies because it does not pay a portion of the management fee to signal provider when recommending a proprietary strategy. Atlas attempts to mitigate any conflicts of interest to the best of its ability by acting in the client's best interest through its fiduciary duty.

Item 12 Brokerage Practices

Brokerage Practices

Atlas does not custody assets and generally recommends that investment management accounts be maintained at E*TRADE Advisor Services (formally Trust Company of America) or similar custodian. Prior to engaging Atlas to provide investment management services, the client will be required to enter into a formal Investment Management Agreement with Atlas setting forth the terms and conditions under which Atlas shall advise on the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian. Factors that Atlas considers in recommending E*TRADE Advisor Services (or any other broker-dealer/custodian to clients) include historical relationship with Atlas, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Atlas' clients shall comply with Atlas's duty to obtain best execution, a client may pay fees that are higher than another qualified broker-dealer/custodian might charge to effect the same transaction where Atlas determines, in good faith, that the fees are reasonable. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's/custodian's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Atlas will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Atlas' investment management fee. Atlas Capital reviews the execution of trades at the custodians on a

regular basis. Trading fees charged by the custodians are reviewed on an annual basis. Atlas Capital does not receive any portion of the trading fees.

Atlas may provide management services via fund investments held at ProFunds, an unaffiliated fund company. In such cases, Atlas's investment programs are generally available through accounts established at ProFunds through unaffiliated financial services providers. In such a case, Atlas's investment services are only available using ProFunds' Investor Class shares. ProFunds may not be suitable for all investors because of the sophisticated techniques the funds may employ. Not all of Atlas's strategies are available at ProFunds. Some of ProFunds' mutual funds entail certain risks, including risk associated with the use of derivatives (swap agreements, futures contracts and similar instruments), imperfect benchmark correlation, leverage and market price variance, all of which can increase volatility and decrease performance. For more on correlation, leverage and other risks please read each investment prospectus carefully. The frequent exchanges permitted by ProFunds investment policies can decrease performance, increase expenses and cause investors to incur tax consequences. Each investor considering ProFunds offerings should carefully review their investment objectives, risks, charges and expenses of ProFunds before investing.

Non-Soft Dollar Research and Additional Benefits

Atlas does not maintain any soft dollar arrangements with E*TRADE Advisor Services or any other Broker/Dealer or custodian. A soft dollar arrangement is a formal agreement between an adviser and a broker-dealer/custodian, whereby the broker-dealer/custodian, in return for executing certain types of securities transactions through the broker-dealer/custodian, is permitted to provide the adviser with investment research, products and/or services which assist the adviser in its investment decision making process for its client accounts pursuant to Section 28(e) of the Securities Exchange Act of 1934.

Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Atlas may receive from E*TRADE Advisor Services (or another broker-dealer/custodian, investment manager, platform or fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Atlas to better monitor and service client accounts maintained at such institutions. Included within the support services that may be obtained by Atlas may be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by Atlas in furtherance of its investment advisory business operations. Atlas does not currently receive any of the above mentioned items. Atlas' clients do not pay more for investment transactions effected and/or assets maintained at E*TRADE Advisor Services as a result of this arrangement. There is no corresponding commitment made by Atlas to E*TRADE Advisor Services or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

Atlas' Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding perceived conflict of interest such arrangement may create.

Directed Brokerage
Atlas recommends that its clients utilize the brokerage and custodial services provided by E*TRADE Advisor Services or similar custodian. Atlas generally does not accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Atlas will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Atlas As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Please Note: In the event that the client directs Atlas to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs. Please Also Note: Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.

Order Aggregation
Transactions for each client account generally will be effected independently, unless Atlas decides to purchase or sell the same securities for several clients at approximately the same time. Atlas may (but is not obligated to) combine or "bunch" such orders to obtain best execution, to negotiate more favorable commission rates or to allocate equitably among Atlas's clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently. Under this procedure, transactions will be averaged as to price and will be allocated among clients in proportion to the purchase and sale orders placed for each client account on any given day. Atlas shall not receive any additional compensation or remuneration as a result of such aggregation.

Item 13 Review of Accounts

Review of Accounts and Triggers
Program reviews are conducted on an ongoing basis by the firm's Principals. Atlas Capital Management primarily manages accounts referred to it by unaffiliated broker-dealers and investment advisers, pursuant to which the firm generally pays a portion of its management fee to the referring broker-dealer or investment adviser in accordance with the parameters of SEC Rule 206(4)-3. The referring broker-dealers and investment advisers generally maintain both the initial and ongoing day-to-day relationship with the client, including initial and ongoing determination of client suitability for the firm's designated strategies. All investment supervisory clients (directly or through their financial services professional) are advised that it remains their responsibility to advise Atlas Capital Management of any changes in their investment objectives and/or financial situation. In performing its services, Atlas Capital Management shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. See below.

Regular Reports
Atlas Capital does not provide written reports to clients however; each client receives statements at least quarterly from the custodian of assets. Additionally, the majority of custodians provide online access to the client to view the account.

Item 14 Client Referrals and Other Compensation

Solicitor Introductions/Referral Fees
If a client is introduced to Atlas Capital Management by either an unaffiliated or an affiliated solicitor, the firm may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. If the client is introduced to the firm by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship, and shall provide each prospective client with a copy of the firm's written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between Atlas Capital Management and the solicitor, including the compensation to be received by solicitor from the firm. The solicitor will continue to receive a referral fee for the duration of the client's relationship with Atlas Capital Management and therefore may have an incentive to continue the recommendation of Atlas Capital Management and its services.

Solicitor-Continued Obligations
The majority of Atlas' clients are referred to Atlas by unaffiliated broker-dealers and investment advisers. In the event the client is referred to Atlas Capital by a broker-dealer or investment adviser, the solicitor shall be exclusively responsible for: (a) assisting the referred client in determining the initial and ongoing suitability for the firm's investment portfolios and/or strategies; and (b) for receiving/ascertaining the referred client's directions, notices and instructions, and forwarding them to the firm, in writing. Atlas Capital Management shall be entitled to rely upon any such direction, notice, or instruction (including any information or documentation regarding the referred client's investment objectives, risk tolerances and/or investment restrictions) until it has been duly advised in writing of changes thereto. Atlas Capital Management shall have no responsibility for solicitor's failure to correctly, accurately and/or timely ascertain/forward/communicate any and all such directions, notices and instructions.

Please Note: Atlas Capital Management may occasionally reimburse certain broker dealers or investment advisers for certain expenses and the broker dealer or investment adviser may pass along those payments to the representative making a referral. These additional payments will not cause the client to pay additional money in management fees. Such additional expense reimbursements will come directly from Atlas Capital Management's receipt of management fees. This may present a conflict of interest in that the broker dealer, investment adviser or their representatives may make a referral based on the expectation of future expense reimbursements and not necessarily based on the quality of investment advice rendered. Atlas Capital Management attempts to resolve this expense reimbursement conflict by requiring pre-clearance from the Chief Compliance Officer prior to disbursing any funds. The CCO will determine whether any such reimbursement is material in amount or frequency to cause any additional concerns. The CCO may use his judgment in approving or denying such reimbursement. The Registrant's Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding this arrangement.

Third Party Marketing Organizations
Atlas Capital may be introduced to Broker/Dealers or Registered Investment Advisory Firms by a Third Party Marketing Organization (TPMO) or one of its affiliates. Atlas Capital may compensate the TPMO or one of its affiliates solely from Atlas Capital's portion of the investment management fees received from clients referred to Atlas Capital by any of the introduced Broker/Dealers or Registered Investment Advisory Firms. Atlas Capital may share the value of the managed assets of the clients referred to it by

the introduced Broker/Dealers or Registered Investment Advisor Firms solely for the purpose of confirming the amount of the payment due the TPMO or its affiliate. No personal or financial information of any client referred to Atlas Capital by an introduced Broker/Dealer of Registered Investment Firm will be shared with the TPMO or any of its affiliates. Such compensation to a TPMO or one of its affiliates will not result in any client paying higher investment management fees.

Services Provided to Other Financial Professionals
Atlas may provide trading signals (buy and sell recommendations) to other unaffiliated financial professionals. This service is provided via subscription or consulting services available *only* to professionals for analysis. The proprietary data is not to be released to the general public via the subscribers. Since this is a professional service not available to the investing public, detailed information about the service is not provided herein.

Unaffiliated Investment Advisers may choose to utilize Atlas's services through a direct Sub-Advisory relationship, or through an unaffiliated Turnkey Asset Management Provider (TAMP). Under the terms of these arrangements, Atlas may not execute an Investment Management Agreement directly with the end client as Atlas is acting strictly as a Sub-Adviser within the investment program. The investor's primary Adviser is responsible for reviewing client suitability, strategy selection and handling all client communications.

Unaffiliated Investment Advisers may also choose to utilize Atlas's services through a Tri-Party Investment Management Agreement. In such a case, Atlas acts as the Separate Account Manager and is responsible for implementing investment management services, along with other services to the Client, as outlined in the client agreement. The Client's Primary Adviser acts as the Investment Adviser, and as such is responsible for obtaining financial and suitability information from the Client, discussing goals and objectives with the Client, maintaining communication with the Client, as well as other specified services.

The firm's Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding the above arrangements and any corresponding conflicts of interest such arrangements may create.

Item 15 Custody Account Statements

All assets are held at qualified custodians, who provide quarterly account statements directly to clients at their address of record or electronically if the client so elects. Clients are encouraged to carefully review the statements provided by their custodians.

Item 16 Investment Discretion

Discretionary Authority for Trading
With the exception of Investment Consulting agreements (Atlas does not have discretionary authority), Atlas Capital accepts discretionary authority to manage accounts on behalf of clients. Atlas Capital has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Discretionary trading authority facilitates placing trades in clients' accounts on their behalf so that we may promptly implement the investment policy. Investment Consulting clients are provided with recommendations that Atlas Capital believes meet their

investment objectives. Atlas Capital will execute only recommendations that have been accepted by the client.

Limited Power of Attorney / Trading Authorization
Clients may be required to sign a limited power of attorney form or Trading Authorization form before Atlas Capital is given discretionary authority at certain custodians. The limited power of attorney or trading authorization form may be included with the account application/contract of the custodian of assets.

Non Managed Assets
Clients may have positions in assets that they do not wish to be subject to Atlas' Investment Management Contract, but would like to be held in the same account as their managed assets. These assets are subject to the custodian's custody fee, but are not included when computing Atlas Capital's investment management fees. Clients are required to acknowledge in writing that Atlas Capital has no discretion regarding these assets and no responsibility to monitor or advise clients on these assets. Any action that a client requests regarding these assets must be provided to Atlas in writing and are subject to usual custodian fees and trading costs.

Item 17 Voting Client Securities

Proxy Voting Policy
Atlas Capital does not vote client proxies. Therefore, although Atlas Capital may provide investment management services relative to client investment assets, the client maintains exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Item 18 Financial Information

Financial Condition
Atlas Capital does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients. A balance sheet is not required to be provided because Atlas Capital does not serve as a custodian for client funds or securities, other than as described above, and does not require prepayment of any fees.

ANY QUESTIONS: The Atlas Capital Management's Chief Compliance Officer, Jerry Jacobs, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.

FORM ADV – PART 2B

Atlas Capital Management Corp.

Item 2 Educational Background and Business Experience

Jerry L. Jacobs CFP, Born 1945,

Education:
Ball State University 1963-1967
College for Financial Planning (CFP) 1982
Institute for Certified Fund Specialist (CFS) 1992
Richard Schilffarth & Associates. LTD PMP 1989
General Securities Sales Supervisor Examination (Options Module & General Module) Series 8, Exam 1997.
AMEX Put and Call Examination Series PC, 1977.
Registered Representative Examination Series 1, 1971.
Interest Rate Options Examination Series 5, 1981.
Uniform Securities Agent State Law Examination Series 63, 1986.
Uniform Investment Adviser Law Examination Series 65, 1992.

Business Background:
Merrill Lynch Registered Representative 1971-1977
Paine Webber Registered Representative 1977-1994
Raymond James Financial Services Inc. Registered Representative 1994-2003
Cantella & Company Registered Representative 2003-2012
Atlas Capital Management Corp. President, Chief Compliance Officer/ Portfolio Manager 1993-Present

Item 3 Disciplinary Information

Legal and Disciplinary
Jerry L. Jacobs has not been involved in any legal or disciplinary events related to past or present activities.

Item 4 Other Business Activities

Other Business Activities
None

Item 5 Additional Compensation

Additional Compensation
None

Item 6 Supervision

Jerry L. Jacobs is the sole owner, President and Chief Compliance Officer of Atlas Capital Management. Jerry L. Jacobs's contact information: Phone 260.637.2857 or jerry@acmc.biz.

FORM ADV – PART 2B

Atlas Capital Management Corp.

Item 2 Educational Background and Business Experience

Joshua A. Kneller, Born 1975,

Education:
Ball State University 1993-1997
Investment Company Products/ Variable Contracts Representative Examination Series 6, 1998
General Securities Representative Examination Series 7, 1998
Uniform Securities Agent Law Examination Series 63, 1997

Business Background:
Northwestern Mutual Life Insurance Special Agent 1995-1998
Robert W. Baird Registered Representative 1998
Edward Jones Registered Representative 1998-2000
Raymond James Financial Services Inc. Registered Representative 2000-2003
Cantella & Company Registered Representative 2003-2012
Atlas Capital Management Corp. Senior Vice President/Portfolio Manager 2000- Present

Item 3 Disciplinary Information

Legal and Disciplinary
Joshua A. Kneller has not been involved in any legal or disciplinary events related to past or present activities.

Item 4 Other Business Activities

Other Business Activities
None

Item 5 Additional Compensation

Additional Compensation
None

Item 6 Supervision

Joshua A. Kneller is the Senior Vice President of Atlas Capital. He reports directly to the President and Chief Compliance Officer of Atlas Capital. The President and Chief Compliance Officer is Jerry L. Jacobs. Joshua A. Kneller's contact information: 260.637.2857 or josh@acmc.biz.

FORM ADV – PART 2B

Atlas Capital Management Corp.

Item 2 Educational Background and Business Experience

Deborah McCoy-Warstler, Born 1960,

Education:
Indiana Life, Accident and Health Insurance License 1994
General Securities Representative Examination Series 7, 1993
Uniform Securities Agent Law Examination Series 63, 1993

Business Background:
Supervisor of New Accounts: Atlas Capital Management 1994-present
Senior Trader: Atlas Capital Management 2009-present
Senior Relationship Manager: Atlas Capital Management 2009-present
Cantella & Company Relationship Manager: 2003-2012

Item 3 Disciplinary Information

Legal and Disciplinary
Deborah McCoy-Warstler has not been involved in any legal or disciplinary events related to past or present activities.

Item 4 Other Business Activities

Other Business Activities
None

Item 5 Additional Compensation

Additional Compensation
None

Item 6 Supervision

Deborah McCoy-Warstler is the supervisor of new accounts and Senior Trader at Atlas Capital. She reports directly to the President and Chief Compliance Officer of Atlas Capital. The President and Chief Compliance Officer is Jerry L. Jacobs. Deborah McCoy-Warstler's contact information: 260.637.2857 or debbie@acmc.biz.

FORM ADV – PART 2B

Atlas Capital Management Corp.

Item 2 Educational Background and Business Experience

Todd M. Clark, Born 1969

Education:
University of Indianapolis 1987-1991
Indiana Life, Accident and Health Insurance License 1994
Indiana Property and Casualty Insurance License 1994
Investment Company Products/ Variable Contracts Representative Examination Series 6, 1999
Uniform Securities Agent Law Examination Series 63, 2002
General Securities Representative Examination Series 7, 2005
Uniform Investment Adviser Law Examination Series 65, 2015

Business Background:
Horace Mann, Licensed Agent 1998-2003
Questar Capital, Registered Representative 2003-2007
American Portfolios, Registered Representative 2007-2015
Atlas Capital Management, Investment Advisor Representative 2015-present
Todd Clark Tax Service, President 2003-present
JMC Real Estate Partners, Partner 2006-present

Item 3 Disciplinary Information

Legal and Disciplinary
Todd M. Clark has not been involved in any legal or disciplinary events related to past or present activities.

Item 4 Other Business Activities

Other Business Activities
Licensed Indiana Health and Insurance Agent, Todd Clark Tax Service, JMC Real Estate Partners.

Item 5 Additional Compensation

Additional Compensation
Licensed Indiana Health and Insurance Agent, Todd Clark Tax Service, JMC Real Estate Partners.

Item 6 Supervision

Todd M. Clark is an Investment Advisor Representative of Atlas Capital Management. He reports directly to the President and Chief Compliance Officer of Atlas Capital. The President and Chief Compliance Officer is Jerry L. Jacobs. Todd M. Clark's contact information: 260.637.2857 or todd@acmc.biz.

FORM ADV – PART 2B

Atlas Capital Management Corp.

Item 2 Educational Background and Business Experience

Cecilia "Cee" Smith, Born 1959

Education:
U.S. Army 1977- 1981
Arapahoe Community College, Littleton, CO 1984-1986
General Securities Representative Examination Series 7, 2000
General Securities Principal Examination Series 24, 2003
Uniform Combined State Law Examination Series 66, 2007

Business Background:
Olde & Company, 1983 - 1984
Lincoln Financial Advisors, Customer Service 1996-2003
Lincoln Financial Advisors, Suitability Analyst 2003 – 2010
Lincoln Retirement Services, Research Analyst 2010- 2014
Lincoln Financial Group, Asset Management Customer Service 2014 – 2017
Atlas Capital Management 2017 - present

Item 3 Disciplinary Information

Legal and Disciplinary
Cecilia "Cee" Smith has not been involved in any legal or disciplinary events related to past or present activities.

Item 4 Other Business Activities

Other Business Activities
None

Item 5 Additional Compensation

Additional Compensation
None

Item 6 Supervision

Cee is an Investment Advisor Representative of Atlas Capital Management. She reports directly to the President and Chief Compliance Officer of Atlas Capital. The President and Chief Compliance Officer is Jerry L. Jacobs. Cecilia Smith's contact information: 260.637.2857 or cee@acmc.biz.