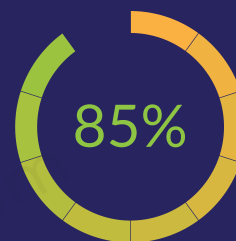


Victory Capital Management

TRUST SCORE



Victory Capital Management, federally registered in 1994, is a Registered Investment Advisor (RIA) in 51 state(s) with a licensed staff of 9 advisors. Victory Capital Management manages \$62 billion and provides investment advisory services for 1,463 clients (1:163 advisor/client ratio).

Fees may vary, please contact an advisor.

BENEFITS

- Firm uses a transparent fee-only model
- Firm has \$1B or more in assets under management
- Firm has been federally registered for 24 years
- Firm services over 1,000 clients
- Communications sent to the firm's website are secure and encrypted
- Firm does not have a disciplinary history
- Firm does not have any misdemeanor convictions
- Firm does not have any felony convictions
- Firm does not have an insurance agent conflict
- Firm does not have an attorney conflict
- Firm does not privately manage or own the products they recommend

CONSIDERATIONS

- There is only one licensed advisor for every 163 clients (industry average 1:50)
- Firm is a broker-dealer, or is affiliated with one, and may be subject to compensation-related conflicts of interest
- Firm accepts performance-based fees and may be incentivized to take inappropriate risks to beat their performance benchmark
- Firm performs side-by-side management with accounts that have differing fee structures. Investment Advisors may be incentivized to favor clients that pay higher fees over others
- Firm may recommend proprietary investments and products that generate larger commissions than other similar non-proprietary products

BENEFITS (cont.)

CONSIDERATIONS (cont.)

Firm may receive soft-dollar benefits that could incentivize them to push trades through broker-dealers that provide advantages to the firm instead of through broker-dealers that could provide the best execution for their clients

Custodian is unknown