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The Centre for Fiduciary Excellence (CEFEX) has conducted an assessment of the recordkeeping and administration operations of **RPG Consultants** (the "Recordkeeper" & "Administration") to determine whether the Recordkeeper's and Administration practices in providing services to clients conform generally to the Standard of Practice for Retirement Plan Service Providers, as defined by the American Society for Pension Professionals & Actuaries (ASPPA) and CEFEX. (referred to as the Standard).¹ Compliance with applicable legal and ethical practices in providing recordkeeping and administration services to clients is the responsibility of the Recordkeeper and Administration. The responsibility of CEFEX is to express an opinion on whether the Recordkeeper and Administration services generally conforms to the Standard in the conduct of its business based on our assessment. Successful completion of the assessment process results in the issuance of the ASPPA Service Provider Certificate.

CEFEX conducted its assessment in accordance with the *Consultant's Assessment of Practice for Retirement Plan Service Providers* (the CAP) prepared by CEFEX. The assessment was conducted, and a draft report was prepared by analyst **Richard N. Carpenter**. The CEFEX Analyst's work papers and draft report were reviewed by the CEFEX

¹ The Standard for Retirement Plan Service Providers is available at www.cefex.org.

Registration Committee (CRC) to ensure impartiality. The assessment requires that the Analyst plan and perform a review of a representative sample of the Recordkeeper's and Administration's written records, interviews with appropriate personnel of the Recordkeeper and Administration, on a test basis, evidence supporting the actions taken by the Recordkeeper and Administration in providing services to its clients. Sampling of records was conducted in accordance with the statistical guidelines used by the International Organization for Standardization, which required that we review records equal to the square root of the total available records. We believe that the Analyst's assessment and the CRC's review of the Analyst's report provide a reasonable basis for this Report and issuance of a Certificate of Registration to the Recordkeeper and Administration.

Neither this Report nor the ASPPA Service Provider Certificate constitutes a financial audit of the Recordkeeper or Administration or a regulatory or compliance audit of the Recordkeeper's or Administration's operations, and CEFEX expresses no opinion regarding the completeness or accuracy of the Recordkeeper's or Administration's financial condition or financial statements or its compliance with applicable legal or ethical requirements with respect to any specific client. Neither this Report nor the ASPPA Service Provider Certificate provides assurance that the Recordkeeper and the Administration will conform to the Standard or applicable legal or ethical requirements in any specific instance, and CEFEX disclaims any responsibility for such conformance.

In our opinion, based on the assessment referred to above, the Recordkeeper and Administration services conforms to all practices and criteria defined in the Standard as of **June 21, 2019** in the conduct of its recordkeeping and administration business generally and is entitled to receive an ASPPA Service Provider Certificate, which shall be valid for a period of 12 months.

CENTRE FOR FIDUCIARY EXCELLENCE
Pittsburgh, PA