

Corbett Road Investment Management Verification and Opportunity MX Composite Performance Examination Report

December 31, 2021





Verification and Performance Examination Report

Corbett Road Investment Management

We have verified whether Corbett Road Investment Management (the “Firm”) has, for the periods from January 1, 2017 through December 31, 2021, established policies and procedures for complying with the Global Investment Performance Standards (GIPS®) related to composite and pooled fund maintenance and the calculation, presentation, and distribution of performance that are designed in compliance with the GIPS standards, as well as whether these policies and procedures have been implemented on a firm-wide basis. GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein. We have also examined the Firm’s Opportunity MX Composite for the periods from January 1, 2017 through December 31, 2021.

The Firm’s management is responsible for its claim of compliance with the GIPS standards, the design and implementation of its policies and procedures, and for the accompanying Opportunity MX Composite’s GIPS composite report. Our responsibilities are to be independent from the Firm and to express an opinion based on our verification and performance examination. We conducted this verification and performance examination in accordance with the required verification and performance examination procedures of the GIPS standards, which includes testing performed on a sample basis. We also conducted such other procedures as we considered necessary in the circumstances.

In our opinion, for the periods from January 1, 2017 through December 31, 2021, the Firm’s policies and procedures for complying with the GIPS standards related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been, in all material respects:

- Designed in compliance with the GIPS standards, and
- Implemented on a firm-wide basis.



A verification covering the periods from January 1, 2014 through December 31, 2016 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

Also, in our opinion, the Firm has, in all material respects:

- Constructed the Opportunity MX Composite and calculated the Opportunity MX Composite's performance for the periods from January 1, 2017 through December 31, 2021 in compliance with the GIPS standards; and
- Prepared and presented the accompanying Opportunity MX Composite's GIPS composite report for the periods from January 1, 2017 through December 31, 2021 in compliance with the GIPS standards.

A performance examination of the Firm's Opportunity MX Composite covering the periods from January 1, 2014 through December 31, 2016 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

This report does not relate to or provide assurance on any specific performance report of the Firm other than the Firm's accompanying Opportunity MX Composite's GIPS composite report, or on the operating effectiveness of the Firm's controls or policies and procedures for complying with the GIPS standards.

ACA Group

ACA Group, Performance Services Division

May 9, 2023

**CORBETT ROAD INVESTMENT MANAGEMENT
OPPORTUNITY MX COMPOSITE
GIPS COMPOSITE REPORTS**

Year End	Total Firm Assets (USD) (millions)	Composite Assets (USD) (millions)	Number of Accounts	Annual Performance Results Composite		Benchmark Index	Composite Dispersion	Composite 3 Yr St Dev	Benchmark 3 Yr St Dev
				Gross	Net				
2021	\$1,020.0	\$225.2	794	18.97%	18.09%	13.15%	.48%	16.49%	10.83%
2020	\$821.2	\$193.9	708	14.07%	13.21%	9.05%	.86%	18.93%	11.67%
2019	\$541.8	\$157.4	597	29.73%	28.76%	14.49%	.51%	13.44%	7.21%
2018	\$278.1	\$66.9	301	0.88%	0.08%	-7.70%	.51%	13.60%	6.59%
2017	\$161.4	\$25.2	96	31.80%	30.65%	12.32%	.78%	11.28%	5.37%
2016	\$14.6	\$6.28	18	.62%	(.63%)	6.16%	.19%	11.98%	6.12%
2015	\$6.97	\$4.92	10	2.12%	.90%	-5.90%	.12%	12.25%	6.39%
2014	\$6.20	\$4.51	7	7.22%	5.93%	2.74%	.37%	10.64%	6.22%
2013		\$4.32	7	39.90%	38.26%	8.47%	.32%	11.30%	7.53%
2012		\$3.08	7	14.07%	12.72%	9.28%	.40%	N.A ²	N.A ²
2011		\$2.28	6	.14%	(1.02%)	-2.91%	N.A ¹	N.A ²	N.A ²

* Performance presented prior to 1/1/2014 occurred while the Portfolio Management Team was affiliated with a prior firm and the Portfolio Management Team members were the only individuals responsible for selecting the securities to buy and sell.

The Opportunity MX Composite contains fully discretionary equity accounts and for comparison purposes is measured against the Morningstar Tactical Allocation Category Average for Open-End Funds. Tactical Allocation portfolios seek to provide capital appreciation and income by actively shifting allocations between asset classes. These portfolios have material shifts across equity regions and bond sectors on a frequent basis. To qualify for the Tactical Allocation category, the fund must first meet the requirements to be considered in an allocation category. Next, the fund must historically demonstrate material shifts within the primary asset classes either through a gradual shift over three years or through a series of material shifts on a quarterly basis. The cumulative asset class exposure changes must exceed 10% over the measurement period.

This strategy typically targets between 35-40 individual equity positions to mitigate concentration risk while avoiding over-diversification. It is able to invest in, and shift frequently among, any exchange traded asset class, any market cap (both foreign and domestic) and is able to utilize products that will short the market. The primary goal is to seek long term capital growth, and secondarily to preserve capital by incorporating Corbett Road's tactical methodology. There is no target tracking error. The strategy's inception date was January 1, 2011, and the Opportunity MX Composite was created January 1, 2014. The Opportunity MX Composite's name was changed from Opportunity to Opportunity MX on March 1, 2023.

Corbett Road Investment Management ("CRIM") claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. CRIM has been independently verified for the periods January 1, 2014 to December 31, 2021.

A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The Opportunity MX Composite has had a performance examination for the periods January 1, 2014 to December 31, 2021. The verification and performance examination reports are available upon request.

¹ Information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year.

² The three-year annualized ex-post standard deviation of the composite is calculated using gross returns. The three-year annualized ex-ex post standard deviation is not presented for the composite and benchmark for periods with less than 36 months of data.

The periods prior to January 1, 2014 represent the performance record established by the Portfolio Management Team while affiliated with a prior firm. The performance record for compliance with the portability requirements of the GIPS standards has been reviewed.

Corbett Road Investment Management, LLC (CRIM) is a Subchapter S Corporation and is claiming compliance with GIPS. The firm's list of composite descriptions and the list of broad distribution pooled funds are available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm.

The U.S. Dollar is the currency used to express performance. Returns are presented gross and net of management fees and include the reinvestment of all income.

Net of fee performance was calculated using actual management fees, except in cases where the fees were taken out of another account based on that client's relationship. In the case where fees were taken out of another account, the fee applied is the flat fee associated with that client or the highest fee based on their tiered schedule and overall assets. The composite included non-fee-paying accounts. The fee applied to non-fee-paying accounts is a model fee that reflects the highest fee based on the tiered schedule at the time the account entered the composite.

In presentations shown prior to August 31, 2016, the composite was compared against the S&P 500 Index. Since September 1, 2016, the composite has been compared against the Morningstar Tactical Allocation Category Average for Open-End Funds. The benchmark was changed retroactively since inception of the composite to more accurately reflect the strategy of the composite.

Past Performance is not indicative of future results. The annual composite dispersion presented is an asset-weighted standard deviation calculated using gross returns for the accounts in the composite the entire year. Policies for valuing investments, calculating performance, and preparing GIPS Reports are available upon request.

The investment management fee schedule for the composite is 1.1% on the first \$500,000, 90bps on the next \$500,000, 80 bps on the next \$500,000, 70 bps on the next \$500,000 and 0.50% on the remainder. Actual investment advisory fees incurred by clients may vary.

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