

# ERISA Section 404(a)(5) Participant Fee Disclosure Notice

## Analytic Solutions Group LLC 401(k) P/S Plan (“Plan”)

This document includes information to help you compare the investment options under your retirement Plan. For more information regarding your investment options, log into your employee site and go to Investments > Manage Investments, or contact the Plan Administrator, Steven Heidorn at 703-975-3469, for a free paper copy of the investment information available online.

### DOCUMENT SUMMARY

This document has three parts:

- Part I: Consists of performance information for plan investment options. This shows how well the investments have performed in the past.
- Part II: Shows the fees and expenses paid if you invest in an option.
- Part III: Contains information about the plan expenses under your retirement plan.

### PART I. PERFORMANCE INFORMATION

**Table 1** focuses on the performance of investment options that do not have a fixed or stated rate of return. This reflects how these options have performed over time to compare them with an appropriate benchmark for the same time periods. Past performance does not guarantee how the investment option will perform in the future. Your investment in these options could lose money. Information about an option’s principal risks is available on the website.

<b>TABLE 1: VARIABLE RETURN INVESTMENTS</b>										
NAME/TYPE OF OPTION	AS OF DATE	AVERAGE ANNUAL TOTAL RETURN AS A %					BENCHMARK AS A %			
		1 YR	5 YR	10 YR	SINCE INCEPTION	INCEPTION DATE	1 YR	5 YR	10 YR	SINCE INCEPTION
Dreyfus Government Cash Mgmt Inst	10/31/2018	1.54%	0.48%	0.29%	3.59%	3/13/1985	1.63%	0.51%	0.31%	2.5%
Invesco DB Commodity Index Tracking Fund	10/31/2018	6.26%	-7.96%	-3.86%	-2.2%	2/3/2006	5.45%	-7.34%	-3.28%	4.29%
Invesco QQQ Trust	10/31/2018	12.41%	16.71%	19.02%	6.96%	3/10/1999	12.67%	16.98%	19.27%	7.47%
iShares 7-10 Year Treasury Bond ETF	10/31/2018	-3.24%	1.51%	3.79%	4.33%	7/22/2002	-3.16%	0%	0%	-0.86%
iShares Core MSCI Emerging Markets ETF	10/31/2018	-12.69%	0.71%	0%	1.42%	10/18/2012	-13.03%	0.66%	8.11%	4.36%
iShares Core S&P Small-Cap ETF	10/31/2018	5.61%	10.03%	14.11%	10.06%	5/22/2000	5.6%	10.06%	14.16%	11.47%
iShares Gold Trust ETF	10/31/2018	-4.59%	-1.95%	5.13%	7.56%	1/21/2005	-4.35%	-1.7%	5.22%	7.11%
iShares JPMorgan USD Emerging Mkts Bond ETF	10/31/2018	-5.68%	3.48%	8.31%	5.41%	12/17/2007	-5.17%	4.09%	9.15%	0%
	10/31/2018	5.07%	9.95%	12.3%	7.33%	11/14/2006	5.45%	10.48%	12.86%	10.3%

iShares MSCI KLD 400 Social ETF										
iShares Select Dividend ETF	10/31/2018	4.59%	10.06%	11.27%	8.09%	11/3/2003	5%	10.5%	11.77%	11.77%
Schwab Short-Term US Treasury ETF	10/31/2018	0.13%	0.48%	0%	0.57%	8/5/2010	0.18%	0.56%	1.02%	3.6%
Schwab US Mid-Cap ETF	10/31/2018	4.55%	9.54%	0%	11.51%	1/13/2011	4.6%	9.57%	15.18%	11.07%
SPDR Barclays Intl Treasury Bond ETF	10/31/2018	-2.48%	-1.12%	2.25%	1.8%	10/2/2007	-2.01%	-0.58%	2.84%	2.71%
SPDR Dow Jones Industrial Average ETF	10/31/2018	9.66%	12.59%	13.16%	8.14%	1/13/1998	9.87%	12.76%	13.33%	10.33%
Vanguard 500 ETF	10/31/2018	7.29%	11.3%	13.2%	14.13%	9/7/2010	7.35%	11.34%	13.24%	10.61%
Vanguard FTSE Developed Markets ETF	10/31/2018	-7.69%	2.35%	7.02%	0.96%	7/20/2007	-7.36%	2.31%	7.51%	6.69%
Vanguard Growth ETF	10/31/2018	8.51%	12.1%	14.59%	8.77%	1/26/2004	8.5%	12.15%	14.06%	7.06%
Vanguard REIT ETF	10/31/2018	-0.08%	7.09%	11.27%	8.15%	9/23/2004	1.69%	7.55%	11.36%	10.11%
Vanguard Short-Term Infl-Prot Secs ETF	10/31/2018	0.39%	0.42%	0%	0.24%	10/12/2012	0.42%	0.49%	2.19%	2.91%
Vanguard Total Bond Market ETF	10/31/2018	-2.06%	1.79%	3.88%	3.66%	4/3/2007	-2.09%	1.83%	0%	3.28%
Vanguard Value ETF	10/31/2018	6.03%	10.31%	12.12%	7.93%	1/26/2004	6.04%	10.35%	12.35%	6.78%

## PART II. FEE AND EXPENSE INFORMATION

**Table 2** shows fee and expense information for the investment options listed in Table 1. This table shows the Total Annual Operating Expenses, which are expenses that reduce the rate of return of the investment option and the Shareholder-Type Fees. These fees are in addition to Total Annual Operating Expenses.

TABLE 2: FEES AND EXPENSES					
NAME/TYPE OF OPTION	AS OF DATE	GROSS ANNUAL OPERATING EXPENSES		SHAREHOLDER-TYPE FEES	
		AS A %	PER \$1,000		
Dreyfus Government Cash Mgmt Inst	10/31/2018	0.21%	\$2.10	See Prospectus	
Invesco DB Commodity Index Tracking Fund	10/31/2018	0.85%	\$8.50	See Prospectus	
Invesco QQQ Trust	10/31/2018	0.2%	\$2.00	See Prospectus	
iShares 7-10 Year Treasury Bond ETF	10/31/2018	0.15%	\$1.50	See Prospectus	
iShares Core MSCI Emerging Markets ETF	10/31/2018	0.14%	\$1.40	See Prospectus	
iShares Core S&P Small-Cap ETF	10/31/2018	0.07%	\$0.70	See Prospectus	
iShares Gold Trust ETF	10/31/2018	0.25%	\$2.50	See Prospectus	
iShares JPMorgan USD Emerging Mkts Bond ETF	10/31/2018	0.4%	\$4.00	See Prospectus	
iShares MSCI KLD 400 Social ETF	10/31/2018	0.25%	\$2.50	See Prospectus	
iShares Select Dividend ETF	10/31/2018	0.39%	\$3.90	See Prospectus	
Schwab Short-Term US Treasury ETF	10/31/2018	0.06%	\$0.60	See Prospectus	
Schwab US Mid-Cap ETF	10/31/2018	0.05%	\$0.50	See Prospectus	
SPDR Barclays Intl Treasury Bond ETF	10/31/2018	0.35%	\$3.50	See Prospectus	
SPDR Dow Jones Industrial Average ETF	10/31/2018	0.17%	\$1.70	See Prospectus	
Vanguard 500 ETF	10/31/2018	0.04%	\$0.40	See Prospectus	
Vanguard FTSE Developed Markets ETF	10/31/2018	0.07%	\$0.70	See Prospectus	
Vanguard Growth ETF	10/31/2018	0.05%	\$0.50	See Prospectus	
Vanguard REIT ETF	10/31/2018	0.12%	\$1.20	See Prospectus	
Vanguard Short-Term Infl-Prot Secs ETF	10/31/2018	0.06%	\$0.60	See Prospectus	
Vanguard Total Bond Market ETF	10/31/2018	0.05%	\$0.50	See Prospectus	

Vanguard Value ETF	10/31/2018	0.05%	\$0.50	See Prospectus
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The cumulative effect of fees and expenses can substantially reduce the growth of your retirement savings. Visit the Department of Labor's web site for an example showing the long-term effect of fees and expenses at <https://www.dol.gov/sites/default/files/ebsa/about-ebsa/our-activities/resource-center/publications/a-look-at-401k-plan-fees.pdf>. Fees and expenses are only one of the many factors to consider when you decide to invest in an option. You may also consider if investing in a particular option, along with your other investments, will help you achieve your financial goals.

## PART III. PLAN RELATED INFORMATION

### 404(C) PLAN

This Plan is designed to meet the requirements of section 404(c) of the Employee Retirement Income Security Act (ERISA). This means the Plan allows you to direct the investments of your account in the investment options listed in Table 1. Plan fiduciaries may be relieved of liability for any losses which are a direct result of your investment instructions.

### INVESTMENT DIRECTIONS

You may give investment direction or make changes to your investment options via [www.sharebuilder401k.com](http://www.sharebuilder401k.com) or by calling Option 4.

### LIMITS ON INVESTMENT DIRECTIONS

The Plan Administrator or Fund Manager may impose limits on ability to give investment directions. Limits by the Fund Manager are described in the Fund prospectus. There may also be limits to prevent excessive trading or timing restrictions.

### DESIGNATED INVESTMENT ALTERNATIVES

Designated Investment Alternative means the investment choices available to you for directing the investment of your account. The investment options listed in Table 1 are the Plan's Designated Investment Alternatives.

### ADDITIONAL INFORMATION

As a plan participant, you may request certain information relating to the Plan's Designated Investment Alternatives including copies of prospectuses, financial statements or reports, statement of the value of a Fund share or unit, and a list of the value or proportion of assets in each Fund from the Plan Administrator:

Steven Heidorn,  
39440 Whispering Brook Pl,  
Leesburg, VA 20175  
703-975-3469

Current information about the Plan's investment options, including fees, expenses and performance updates are available on your Plan's website.

## PLAN FEES AND EXPENSES

### ADMINISTRATION EXPENSES

These charges cover the day-to-day operation of the Plan. The Plan Sponsor may pay these expenses or elect to have them paid out of Plan assets by the Participants. If paid by Participants, the expense will be deducted from a Participant's account balance on a pro-rata basis. This means the expense is allocated based on the ratio of a Participant's account balance to the total account balance of all Plan Participants.

For example: If the annual administration expense is \$1,500.00, your account balance is \$10,000.00, and the total plan assets are \$500,000.00, you would pay 2% ( $\$10,000/\$500,000$ ) of the \$1,500.00 expense. This equals \$30.00. The dollar amount of administration expenses charged against your account will be reported on your participant statement. The Plan's administration expenses are listed in the tables below:

#### TPA Services

Fee Description	Participant Range	Amount
Base Retirement Administration Fee	0 - 10	\$70.00 Monthly
Base Retirement Administration Fee	11 - 25	\$86.00 Monthly
Base Retirement Administration Fee	26 - 50	\$110.00 Monthly
Base Retirement Administration Fee	51 - 100	\$130.00 Monthly
Base Retirement Administration Fee	101 - Max	\$150.00 Monthly

#### TPA Services PAI

Fee Description	Participant Range	Amount
Per Participant Administration Fee	0 - Max	\$2.80 Monthly

#### ADVISORY EXPENSES

The Plan may use a fee-based Financial Advisor for certain advisory services. These advisory services may include providing investment education, enrollment assistance, selecting plan investments, and determining the Plan's investment policy. If the Plan uses a Financial Advisor, the expense for advisory services is listed in the table below and will be charged to the Participant's account. If nothing is listed below, this fee is not applicable to your plan.

#### ASSET MANAGEMENT AND RECORDKEEPING EXPENSES

Capital One Advisors, LLC serves as an ERISA 3(38) Investment Advisor determining the investments made available within your 401(k) plan. They also adjust model portfolio funds and asset allocations consistent with the Capital One Advisors, LLC Investment Philosophy and Policy. Capital One Advisors Investment Committee regularly reviews funds and model portfolios and employs financial models and market data from outside firms in making investment decisions. These services lower the fiduciary risk and duties for your company in offering your 401(k) plan. As part of these services for the plan, Capital One Advisors, LLC also provides employee guidance materials. Capital One Advisors, LLC acts as a fiduciary under ERISA and as an investment advisor under the federal Investment Advisors Act of 1940 and state law.

The charges for recordkeeping services include access to certain mutual funds, maintenance of individual account balances, and reconciliation of trust and administrative records.

The Asset Management Expense covers these investment services, and all trading costs associated with ETF's available in the plan. This expense is outside of the gross operating expense of the funds. The cost for Asset

Management services and the recordkeeping services are stated in the table below, and may be charged to the participant's account.

<b>Fee Description</b>	<b>Amount</b>	<b>Participant Range</b>	<b>Asset Range</b>
Investment Fiduciary Fee	0.75% Annual	0 - Max	\$0.00 - \$499,999.00
Investment Fiduciary Fee	0.65% Annual	0 - Max	\$500,000.00 - \$1,999,999.00
Investment Fiduciary Fee	0.55% Annual	0 - Max	\$2,000,000.00 - \$4,999,999.00
Investment Fiduciary Fee	0.45% Annual	0 - Max	\$5,000,000.00 - Max

### **CUSTODIAL EXPENSES**

These are charges for Plan custodial services. The Plan's Custodian holds the Plan's assets for safekeeping, provides account administration, and facilitates transaction settlement. Per direction and authorization of the Plan Sponsor or plan official, the Custodian will distribute and trade Plan assets. The cost for custodial services is listed in the table below and will be charged to the Participant's account. No table is included below, there are no custodial expenses.

### **INTEREST CREDIT**

When certain transactions are initiated, a period of time may exist when the cash associated with such transaction is held in a PAi Trust bank account while awaiting transaction completion. While held in such a cash account, the amounts generate interest and/or an interest like credit on this cash in transit, which is retained by PAi Trust as compensation. The rate earned on this cash is roughly approximated by the prime rate in effect for the period.

### **INDIVIDUAL EXPENSES**

If you utilize certain Plan or administrative options the fees below are deducted directly from your account. The cost of these optional features are included in the Table below.

### **ADDITIONAL PARTICIPANT SERVICES**

Annual Loan Maintenance Fee	\$75.00 Per Year
Check Reissue	\$25.00 Per Event
Distribution	\$75.00 Per Event
Distribution QDRO	\$300.00 Per Event
Distribution Transfer In-Kind	\$75.00 Per Event
Loan Default Fee	\$75.00 Per Event
Loans	\$75.00 Per Event
Required Minimum Distribution	\$100.00 Per Event

Stop Payment Check

\$35.00 Per Event

**PAYROLL INTEGRATION FEE**

Certain payroll contract services are provided to the plan in connection with payroll system integration. These services include transmitting payroll files containing contributions and other plan information, and providing support to resolve file transmission issues. The cost for these services may be charged to the participant's account in an amount of up to \$2 per month, per participant.

## Analytic Solutions Group LLC 401(k) P/S Plan Fee Disclosure

### DEFINITION OF TERMS

#### **ADMINISTRATION AND RECORDKEEPING FEE**

This fee is to cover the cost of the day-to-day operation of the plan, tracking Participant account balances, recording transactions and providing compliance and participant support services. For new or takeover plans, this fee will include transition services to PAi. Provision of administrative services does not make PAi a “Plan Administrator” under ERISA Section 3(16)(A).

#### **BACK-END LOAD**

Fee or sales charge that is paid when selling certain investments within a specified number of years. The fee is a percentage of assets being sold and decreases over time until it is zero.

#### **BASIS POINT (BPS)**

A basis point equals 1/100th of a percent (0.01%). For example, a charge of 25 basis points on an account balance of \$10,000 is \$25.00 ( $0.25\% \times 10,000 = 25.00$ ).

#### **DISTRIBUTION EXPENSE**

Fee charged for plan distributions such as loans, hardship, in-service, termination and retirement. The fee covers processing the paperwork, issuing the check, and may include preparation of Form 1099R to report the distribution to the IRS and Participant.

#### **EXPENSE RATIO**

A measurement of what it cost to operate a mutual fund. The Expense ratio is determined by dividing the fund’s operating expenses by the value of the fund’s total assets and expressed as a percentage of total assets.

#### **LOAN MAINTENANCE FEE**

Fee for tracking loan payments, updating repayment schedule and monitoring outstanding loan balance.

#### **LOAN PROCESSING FEE**

Fee charged to process a plan loan application.

#### **MANAGEMENT FEE**

The amount paid by a mutual fund to the investment adviser for its services.

#### **PARTICIPANT**

Person who has an account in the plan.

#### **PLAN DOCUMENT FEE**

Fee charged for providing the plan document.

#### **PLAN LOAN**

If certain requirements are met, participants may borrow money from their plan account. Not all Plans allow for loans.

#### **PRODUCT TERMINATION FEE**

Fee charged when surrendering or terminating an investment product.

**SERVICE PROVIDER TERMINATION CHARGE**

Fee charged when terminating the relationship with a service provider in connection with a plan termination or transferring services to another provider. Termination charges may also be referred to as “surrender” or “transfer” fees.

**12B-1 FEE**

A charge to shareholders to cover a mutual fund’s shareholder servicing, distribution and marketing costs.

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