

Crescat Portfolio Management, LLC Verification and Crescat Large Cap Composite Performance Examination Report

December 31, 2021





Verification and Performance Examination Report

Investors

Crescat Portfolio Management, LLC

We have verified whether Crescat Portfolio Management, LLC (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 Crescat Large Cap 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 Crescat Large Cap 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, 2006 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 Crescat Large Cap Composite and calculated the Crescat Large Cap 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 Crescat Large Cap 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 Crescat Large Cap Composite covering the periods from January 1, 2006 through December 31, 2016 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

We have not been engaged to examine, and did not examine, the Supplemental Information included in the accompanying GIPS composite report and, accordingly, we express no opinion on the Supplemental Information.

This report does not relate to or provide assurance on any specific performance report of the Firm other than the Firm's accompanying Crescat Large Cap 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

December 28, 2023

Performance and Assets by Year															
Year End	Total Firm Assets ¹		Composite		Returns					3-Year Annualized Downside Deviation			3-Year Annualized Standard Deviation		
	Regulatory Assets (\$000s)	Net Assets (\$000s)	Assets (\$000s)	# of Accts	Composite (Gross) (Net)		S&P 500	Russell 1000	Composite Dispersion ²	Composite (Net)	S&P 500	Russell 1000	Composite (Net)	S&P 500	Russell 1000
2021	\$394,176	\$251,254	\$12,537	42	5.5%	3.7%	28.7%	26.5%	1.4%	8.8%	10.1%	10.5%	18.9%	17.4%	18.0%
2020	\$230,407	\$174,654	\$13,309	44	13.9%	12.0%	18.4%	21.0%	1.0%	6.9%	12.0%	12.3%	16.0%	18.8%	19.4%
2019	\$197,319	\$63,092	\$14,560	43	16.7%	14.7%	31.5%	31.4%	0.4%	3.5%	8.0%	8.1%	7.7%	12.1%	12.2%
2018	\$150,334	\$52,150	\$15,738	53	3.0%	1.3%	-4.4%	-4.8%	0.2%	3.0%	7.7%	7.8%	6.0%	11.0%	11.1%
2017	\$164,767	\$66,706	\$16,329	55	11.6%	9.8%	21.8%	21.7%	0.3%	4.1%	5.4%	5.5%	7.9%	10.1%	10.1%
2016	\$240,023	\$92,667	\$14,704	51	15.1%	13.0%	12.0%	12.1%	0.4%	5.1%	5.9%	6.0%	9.4%	10.7%	10.8%
2015	\$150,098	\$72,394	\$11,290	40	3.8%	2.1%	1.3%	0.9%	0.7%	5.3%	5.4%	5.3%	10.6%	10.6%	10.6%
2014	\$88,452	\$50,059	\$13,646	42	13.9%	12.0%	13.7%	13.2%	0.6%	5.9%	4.7%	4.7%	11.0%	9.1%	9.2%
2013	\$85,346	\$44,078	\$12,596	44	23.6%	21.6%	32.4%	33.1%	0.6%	8.0%	6.8%	7.0%	14.7%	12.1%	12.4%
2012	\$74,211	\$37,881	\$9,407	41	11.6%	9.8%	16.0%	16.4%	0.7%	8.4%	9.2%	9.4%	15.3%	15.3%	15.6%
2011	-	\$57,717	\$9,912	40	1.7%	0.0%	2.1%	1.5%	1.8%	9.4%	11.5%	11.6%	19.2%	19.0%	19.2%
2010	-	\$64,232	\$9,210	37	26.5%	24.4%	15.1%	16.1%	0.8%	15.5%	16.8%	17.1%	22.4%	22.2%	22.6%
2009	-	\$44,393	\$8,098	35	20.1%	18.0%	26.5%	28.4%	0.3%	15.4%	15.8%	16.1%	22.2%	19.9%	20.3%
2008	-	\$52,797	\$6,671	35	-22.0%	-23.3%	-37.0%	-37.6%	1.0%	15.3%	13.8%	14.3%	20.1%	15.3%	15.8%
2007	-	\$10,861	\$6,534	31	20.4%	18.3%	5.5%	5.8%	0.6%	9.1%	4.4%	4.5%	15.9%	7.8%	7.9%
2006	-	\$1,554	\$5,504	30	17.3%	15.2%	15.8%	15.5%	0.9%	8.9%	3.7%	3.8%	15.6%	6.9%	7.1%
2005	-	-	\$5,386	33	25.6%	23.2%	4.9%	6.3%	1.0%	7.9%	3.8%	3.8%	14.9%	9.2%	9.3%
2004	-	-	\$3,455	30	13.1%	10.8%	10.9%	11.4%	0.5%	10.5%	10.5%	10.4%	15.8%	15.1%	14.9%
2003	-	-	\$3,965	31	31.4%	29.0%	28.7%	29.9%	2.4%	15.4%	13.6%	13.6%	22.5%	18.3%	18.3%
2002	-	-	\$3,878	30	-16.8%	-18.4%	-22.1%	-21.7%	1.0%	17.4%	15.0%	15.1%	24.8%	18.8%	19.0%
2001	-	-	\$9,252	81	-3.8%	-5.6%	-11.9%	-12.5%	2.6%	15.1%	11.6%	11.9%	26.9%	16.9%	17.3%
2000	-	-	\$5,926	50	6.5%	4.3%	-9.1%	-7.8%	8.6%	NA	NA	NA	NA	NA	NA
1999	-	-	\$2,703	20	70.8%	67.8%	21.0%	20.9%	NA ³	NA	NA	NA	NA	NA	NA

Management Fee Schedule

Portfolio Size	Annual Fee
First \$250K	2.00%
Next \$250K	1.50%
Next \$500K	1.25%
Next \$4M	1.00%
Next \$5M	0.90%
Next \$15M	0.85%
Next \$25M	0.80%

1 Prior to 2008, the Crescat Large Cap Composite was managed by predecessor firm Smith Portfolio Management LLC. Therefore, the composite assets are not included in Crescat Portfolio Management's Total Firm Net Assets until 2008. Beginning in 2012, CPM started presenting Total Firm Regulatory Assets as supplementary information.

2 Composite Dispersion applies to gross returns.

3 There was only 1 account in part of the first quarter 1999. Therefore, an annual composite dispersion is not applicable.

GIPS® Information:

Crescat Portfolio Management LLC claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Crescat Portfolio Management LLC (CPM) has been independently verified for the periods 1 January 2006 through 31 December 2020. Smith Portfolio Management LLC (SPM) has also been independently verified for the periods 1 January 2003 through 31 March 2008, when it was merged into CPM. 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 Crescat Large Cap Composite has had a performance examination for the periods 1 January 2003 through 31 December 2020. The verification and performance examination reports are available upon request.

The Composite was created on 1 January 2003. From inception on 1 January 1999 until 31 December 2002, the Portfolio Manager was affiliated with a prior firm. On 1 January 2003, the Portfolio Manager left the prior firm and substantially all the assets transferred to SPM, where they remained until SPM was merged into CPM. The Composite was formerly known as the Blue Chip Core Equity Composite until the merger. A performance examination was conducted on the Composite beginning 1 January 2003 through 31 December 2008. Copies of the verification reports are available upon request. The firm's list of pooled fund descriptions for limited distribution pooled funds and composite descriptions are available upon request.

The Crescat Large Cap Composite contains all discretionary accounts that are managed according to the firm's large-cap equity process. The manager may invest in Top 1000 U.S. listed stocks weighted by market capitalization. From inception through November 2007, the Composite was measured against the S&P 500 Index as the benchmark for performance comparison. Beginning 1 December 2007, the Composite converted to the Russell 1000 Index as the primary benchmark because it was deemed to parallel the risk and return characteristics of the Composite more closely. The Russell 1000 is a market-cap weighted index of the 1,000 largest companies in US equity markets. It represents a broad scope of companies across all sectors of the economy. It is a commonly followed index among institutions. This index contains many of the same securities as the S&P 500 but is broader and includes some mid-cap companies. The S&P 500 is shown as additional information. The S&P 500 index is perhaps the most commonly followed stock market index. It is considered representative of the U.S. stock market at large. It is a market-cap-weighted index of the 500 largest and most liquid companies listed on the NYSE and NASDAQ exchanges. Although the companies are U.S. based, most of them have broad global operations so the index is representative of the broad global economy. The S&P 500 is materially different from the composite strategy. The minimum account size for this Composite is \$50,000. Prior to 1 January 2006, the minimum account size for inclusion in the Composite was \$20,000.

CPM aims to deliver significant alpha in the Composite relative to the benchmark through highly selective allocation to sectors and individual stocks. As such, CPM does not aim to track the performance of the benchmark but, rather, to outperform it with substantial upside deviation. Because standard deviation penalizes high upside deviation, it is not an appropriate risk metric for the Composite. Downside deviation is more appropriate because it captures downside risk but does not penalize for upside deviation. Therefore, both downside and standard deviation are shown. CPM calculates downside deviation relative to a 0% performance level, annualizing the trailing three years of monthly performance numbers.

CPM maintains a complete list and description of composites that is available upon request. Management fees are billed quarterly in advance and waived on employee accounts. Employee accounts have not been included in the Composite since 1999. As of 31 December 1999, 3% of Composite assets were non-fee-paying accounts. All composite assets have been fee-paying for all subsequent years.

All reported returns are purely historical, are no indication of future performance, and may be adjusted subsequently if necessary. The US 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. Policies for valuing investments, calculating performance, and preparing GIPS Reports are available upon request. The dispersion of annual returns is measured by the standard deviation across asset-weighted portfolio returns represented within the Composite for the full year.

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