

This document discloses information concerning certain bank-maintained Collective Investment Fund ("CIFs") investments maintained by TD AMERITRADE Trust Company ("TDATC"). The following information pertains to the objectives and operations of the TOPS Strategic Allocation Portfolios Funds. These CIFs are an investment option available to you through your employer's qualified retirement plan. It is important that you review this information prior to investing. However, this document is not a prospectus and is only part of the information you may need to make your investment decisions. **Before making any investment decision, you should consider all relevant material and, as appropriate, consult an investment professional.** To the extent that this information varies from the Declaration of Trust establishing the TOPS Strategic Allocation Portfolios Funds, the Declaration of Trust shall control. You may obtain a copy of the Declaration of Trust by contacting TDATC at 877-270-6892, ext. 74761.

STRATEGIC ALLOCATION PORTFOLIOS FOR QUALIFIED RETIREMENT PLANS

What are the TOPS Strategic Allocation Portfolios

The TOPS Strategic Allocation Portfolios Funds are CIFs maintained by TDATC that are designed to serve the investment needs of tax-qualified retirement plans. The Funds are not mutual funds registered under the Investment Company Act of 1940, as amended, ("1940 Act"), and Fund unit holders are not entitled to the protections of the 1940 Act. In addition, the Funds' units are not securities required to be registered under the Securities Act of 1933, or applicable securities laws of any state or other jurisdiction. The regulatory requirements applicable to a CIFs differ from those applicable to a mutual fund, although both types of funds commingle participants' assets with the objective of obtaining economies of scale in investment management. The Fund's units are not traded on an exchange or "over the counter" and as a result, the unit values are not available for publication in the newspapers. Daily unit values may be obtained from the third-party administrator or recordkeeper for your employer's plan.

Fund Trustee

TDATC is a Maine-chartered, non-depository trust company and a wholly-owned subsidiary of TD AMERITRADE Holding Corporation. TDATC is not a member of FINRA/SIPC. TDATC offers trust and custody services, including back-office support, to a wide range of employee benefit plans. Services are provided through TDATC's institutional clients only, such as third-party administrators, recordkeepers and registered investment advisors. In addition, TDATC serves as trustee of the Funds described herein.

TOPS Strategic Allocation Portfolios

Fund Objectives

TOPS Strategic Allocation Portfolios are CIFs that invest primarily in Exchange Traded Funds (ETFs) representing multiple asset classes, including large cap value equities, large cap growth equities, mid cap value equities, mid cap growth equities, small cap value equities, small cap growth equities, large cap international equities, emerging markets equities, real estate, natural resources, intermediate corporate bonds, short-term bonds, government bonds, high-yield bonds and cash. Mutual fund investments may be made within the Portfolios where appropriate.

The CIFs currently available are:

- Capital Preservation Portfolio
- Income & Growth Portfolio
- Balanced Portfolio
- Moderate Growth Portfolio
- Growth Portfolio
- Aggressive Growth Portfolio

The Portfolios are designed without reference to any particular investor. They are designed to create a non-individualized investment strategy, that is, without regard to any particular account's specific investment objectives, guidelines or restrictions. You, or you and your advisor, will need to decide which CIF or CIFs, or blends thereof, are appropriate for you and your account, taking into consideration all of your individualized factors, including diversification, investment objectives, guidelines or restrictions, portfolio composition and diversification, including any preexisting or continuing holdings in your account. The investment objective and allocation strategies of each of the CIFs are:

CAPITAL PRESERVATION PORTFOLIO

The Capital Preservation Portfolio seeks to preserve capital and provide moderate income and growth by investing in a diversified portfolio of corporate and government bonds, U.S. and foreign stocks and real estate. The Capital Preservation Portfolio places a greater emphasis on bonds than equities and the equity portion of the Portfolio is primarily comprised of value stocks. The Capital Preservation Portfolio is appropriate for investors with short-to intermediate-term investment time horizons who are seeking capital preservation as well as the opportunity for income and growth. Although the Portfolio is constructed in a manner that reduces volatility, the investment holdings are still subject to investment risk and loss of investment value.

INCOME & GROWTH PORTFOLIO

The Income and Growth Portfolio seeks to provide income and growth of capital by investing in a diversified portfolio of corporate and government bonds, U.S. and foreign stocks, real estate and natural resources. The Income & Growth Portfolio places a greater emphasis on bonds than equities, and the equity portion of the Portfolio is primarily comprised of value stocks. The Income & Growth Portfolio is appropriate for investors with intermediate-to long-term investment time horizons who seek to earn income but still benefit from stock market growth. In exchange for the ability to benefit from growth, the investor is willing to accept a relatively low amount of volatility.

Balanced Portfolio:

The Balanced Portfolio seeks to provide growth of capital and income by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources and corporate and government bonds. The Balanced Portfolio places a greater emphasis on equities than bonds, and the equity portion of the Portfolio is primarily comprised of value stocks. The Balanced Portfolio is appropriate for investors with intermediate-to long-term investment time horizons who seek to balance out their desire for investment returns with their desire for a more reduced level of risk than found in more aggressive asset allocations

Moderate Growth Portfolio:

The Moderate Growth Portfolio seeks to provide growth of capital by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources and corporate and government bonds. The Moderate Growth Portfolio places a greater emphasis on equities than bonds, and the equity portion of the Portfolio is invested in both growth and value stocks. The Moderate Growth Portfolio is appropriate for investors with long-term investment time horizons who are willing to accept a moderate amount of volatility in exchange for the potential to earn greater returns than historically available with more conservative asset allocations.

Growth Portfolio:

The Growth Portfolio seeks to provide growth of capital by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources and corporate and government bonds. The Growth Portfolio places a greater emphasis on equities than bonds, and the equity portion of the Portfolio is primarily invested in growth stocks. The Growth Portfolio is suitable for investors with long-term investment time horizons who are willing to accept volatility in exchange for higher potential investment returns.

Aggressive Growth Portfolio:

The Aggressive Growth Portfolio seeks to provide growth of capital by investing in a portfolio of U.S. and foreign stocks, real estate and natural resources. The Aggressive Growth Portfolio primarily invests in growth stocks. The Aggressive Growth Portfolio is appropriate for investors with long-term investment horizons who are willing to accept a greater degree of volatility in exchange for higher potential returns than historically provided by more diversified asset allocations.

Strategic Allocation Portfolio Target 2015:

Primarily through the use of ETFs, the SAP Target 2015 seeks to provide growth of capital and income by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources

and corporate and government bonds. The SAP Target 2015 places a greater emphasis on equities than bonds, and the equity portion of the Fund is primarily comprised of value stocks. The SAP Target 2015 may be appropriate for investors with intermediate-to long-term investment time horizons who seek to balance out their desire for investment returns with their desire for a more reduced level of risk than found in more aggressive asset allocations. As the stated target date approaches, the Fund will place a greater emphasis on fixed income than equities.

Strategic Allocation Portfolio Target 2025:

Primarily through the use of ETFs, the SAP Target 2025 seeks to provide growth of capital by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources and corporate and government bonds. The SAP Target 2025 places a greater emphasis on equities than bonds, and the equity portion of the Fund is invested in both growth and value stocks. The SAP Target 2025 may be appropriate for investors with long-term investment time horizons who are willing to accept a moderate amount of volatility in exchange for the potential to earn greater returns than historically available with more conservative asset allocations. As the stated target date approaches, the Fund will place a greater emphasis on fixed income than equities.

Strategic Allocation Portfolio Target 2035:

Primarily through the use of ETFs, the SAP Target 2035 seeks to provide growth of capital by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources and corporate and government bonds. The SAP Target 2035 places a greater emphasis on equities than bonds, and the equity portion of the Fund is primarily invested in growth stocks. The SAP Target 2035 may be appropriate for investors with long-term investment time horizons who are willing to accept volatility in exchange for potentially higher investment returns. As the stated target date approaches, the Fund will place a greater emphasis on fixed income than equities.

Strategic Allocation Portfolio Target 2045:

Primarily through the use of ETFs, the SAP Target 2045 seeks to provide growth of capital by investing in a diversified portfolio of U.S. and foreign stocks, real estate, natural resources and corporate and government bonds. The SAP Target 2045 places a greater emphasis on equities than bonds, and the equity portion of the Fund is primarily invested in growth stocks. The SAP Target 2045 may be appropriate for investors with long-term investment time horizons who are willing to accept volatility in exchange for potentially higher investment returns. As the stated target date approaches, the Fund will place a greater emphasis on fixed income than equities.

For liquidity and administrative purposes, TDATC, as Trustee, requires that the Funds maintain at least 3% of their assets in cash. The mandatory cash component for the Funds may be comprised of a depository account which may be maintained by the Trustee or an affiliate of the Trustee.

Currently, the Trustee contemplates that substantially all of the assets of the CIFs will be invested according to the corresponding Strategic Allocation Portfolio strategies developed and provided by ValMark Advisers, Inc. Each of the TOPS Strategic Allocation Portfolio comprise an appropriate mix of ETFs and, where appropriate, index mutual funds, designed to meet the investment objective of the portfolio. For more information about ValMark Advisers, Inc. visit www.topsportfolios.com.

About Risk

Units in the CIFs are not deposits or obligations of, or endorsed or guaranteed by, TDATC or its affiliates, and the units are not insured by the Federal Deposit Insurance Corporation (FDIC) or any other independent organization. The CIFs are also subject to investment risks, including possible loss of the principal amount. There is no assurance that the stated objective of a particular CIF will be achieved. The potential risks applicable to the CIFs include, but are not limited to the following:

Market Risk. CIFs are subject to market risk, which is the chance that the value of the investments in the CIF may decline over time, causing a reduction in the value of the CIF. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices. Bond markets also usually move in cycles, with bond values being inversely related to changes in interest rates. As interest rates rise, the value of a bond tends to decrease, and as interest rates decline, the value of a bond tends to increase.

Foreign Market Risk. A CIF that invests in funds holding foreign securities may also be subject to the risks of investment in foreign markets. Investing in foreign markets can involve a greater level of risk, as there is often a lower degree of market volume and liquidity than in the U.S. markets and this may result in higher price volatility. In addition, currency risk must also be considered. Foreign securities are denominated in foreign currencies, which may change in value in relation to the U.S. dollar, possibly for long periods of time. When a foreign currency declines in value in relation to the U.S. dollar, the return on foreign investments may likewise decline. Foreign governments may also intervene in currency markets or impose approval or registration processes, which could adversely affect the value of the CIF.

Real Estate Risk. A CIF that invests in funds holding real estate securities (e.g., REITs) involves many of the risks of investing directly in real estate such as declining real estate values, changing economic conditions and increasing interest rates, which could adversely affect the value of the CIF.

Commodity Risk. A CIF that invests in funds holding commodity investments is subject to commodity price fluctuations. Commodity prices generally fluctuate in relation to, among other things, the cost of producing commodities, changes in consumer demand for commodities, hedging and trading strategies of commodity market participants, disruptions in commodity supply, weather, as well as political and other global events, which could adversely affect the value of the CIF.

Small and Mid-Cap Risk. A CIF that invests in small capitalization and mid-capitalization companies may be subject to price volatility. The securities of both small-cap and mid-cap may trade less frequently and in smaller volume than larger, more established companies. Accordingly, their performance can be more volatile and they face greater risk of business failure, which could, depending on the allocation of the CIF's assets to such sectors, increase the volatility of a CIF's performance.

A particular CIF may or may not contain one or more of the asset types described above. Please refer to the CIF Fact Sheet for information regarding asset allocation.

Who May Want to Invest

The Fund may be an appropriate investment for investors seeking professional management of their retirement account assets.

Trustee and Management Fees

There are no sales commissions or redemption fees for purchases and sales of interests in the CIFs. The Trustee charges a fee equal to 0.50% per annum of total assets held in each Portfolio. The fee accrues on a daily basis and is payable monthly in arrears. The Trustee's fee is charged directly to the particular CIF. A portion of the Trustee fee, 0.15%, will be paid to ValMark Advisers, Inc. for services provided to the Trustee.

It is intended that the CIFs will invest in a mixture of ETFs and mutual funds that charge fees ranging from 0.09% to 1.20% per annum (the "Management Fee"), depending on the specific asset allocation for each CIF. The Management Fee is an additional cost incurred by and deducted from the daily net asset value of the account holding a CIF which may include such underlying ETFs or mutually funds which, as stated, have their own fee structure.