



717 17th Street, Suite 1850
Denver, CO 80202

303-295-0777 TEL
303-292-3492 FAX

855-395-3954 TFREE
www.publictrustadvisors.com

Public Trust Advisors, LLC

Firm Brochure Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Public Trust Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 1-855-395-3954 or by email at: barry.howsden@publictrustadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Public Trust Advisors, LLC is also available on the SEC's website at www.adviserinfo.sec.gov. Public Trust Advisors, LLC's CRD number is: 159189

717 17th St. Suite 1850
Denver, CO 80202
1-855-395-3954
www.publictrustadvisors.com

Registration does not imply a certain level of skill or training.

Version Date:
03/28/2017

Item 2: Material Changes

This section describes the material changes to Public Trust's Brochure since its annual updating amendment on April 26, 2016. This Brochure contains the following updates:

- Types of Advisory Services (Item 4, Part B) has been updated to provide more details on the types of business products offered, including the new product offering of Term Series Investments and Public Trust took over the portfolio management, fund accounting, administrative and transfer agency services for Virginia Investment Pool Trust Fund ("VML").
- Types of Advisory Services (Item 4, Part B) has been updated to include language on reporting on Non-Managed Accounts.
- Fees and Compensation (Item 5, Part A) has been updated to include the fee structure associated with VML and the Term Series Investments. Additionally, the Separately Managed Account (SMA) Fees have been modified to be more descriptive on the calculation methodology.
- Types of Clients (Item 7) has been updated to denote that the Term Series Investment has a minimum investment amount of \$500,000.00.
- Methods of Analysis, Investment Strategies, and Risk of Investment Loss (Item 8, Part A) has been updated to include the Term Series Investments as one of the investment strategies.
- Brokerage Practices (Item 12, Part B) has been updated to include language on odd lots with small allocations and the possibility of non-discretionary accounts being excluded from block trades.
- Brokerage Practices (Item 12, Part E) section on Trade Errors has been added.
- Client Referrals and Other Compensation (Item 14, Part B) has been updated for solicitation arrangements as previously Public Trust did not have any arrangements in place but now do. This section now includes the compensation arrangements that can be used for solicitation arrangements.
- Other Financial Industry Activities and Affiliations (Item 10, Part B) has been updated to reflect that PT Asset Management, LLC is no longer an SEC registered investment adviser.

Item 3: Table of Contents

Table of Contents

Item 2: Material Changes	i
Item 3: Table of Contents.....	ii
Item 4: Advisory Business	1
Item 5: Fees and Compensation	4
Item 6: Performance-Based Fees and Side-By-Side Management	6
Item 7: Types of Clients.....	7
Item 8: Methods of Analysis, Investment Strategies, and Risk of.....	7
Investment Loss	7
Item 9: Disciplinary Information	10
Item 10: Other Financial Industry Activities and Affiliations	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
Item 12: Brokerage Practices	12
Item 13: Reviews of Accounts	14
Item 14: Client Referrals and Other Compensation.....	15
Item 15: Custody	15
Item 16: Investment Discretion.....	16
Item 17: Voting Client Securities (Proxy Voting).....	16
Item 18: Financial Information.....	16

Item 4: Advisory Business

A. Description of the Advisory Firm

Public Trust Advisors, LLC is a Limited Liability Company organized in the state of Colorado.

This firm has been in business since September of 2011, with offices in 8 states including CA, CO, CT, FL, NM, NY, OH and TX. The principal owners are Thomas D Jordan, Gregory S Wright, Randy S Palomba, Thomas N Tight, John F Grady and Chris M. DeBow.

Public Trust Advisors, LLC (hereinafter "Public Trust") may from time to time utilize the services of a third party in a sub-advisory capacity to provide certain services to its clients, including, but not limited to, arbitrage rebate compliance services. In these cases, Public Trust will obtain written permission from the client and ensure the client receives all required disclosure information regarding the sub-adviser. Public Trust will continually monitor the services provided by the sub-adviser.

B. Types of Advisory Services

Public Trust offers the following services to advisory clients:

Investment Advisory Services

Public Trust offers investment advisory services predominantly to state and local U.S. government entities, non-profit corporations and charitable organizations. Service Product Offerings:

- Separately Managed Accounts (SMA) - These services are provided on either a discretionary or non-discretionary basis, depending upon each Client's needs and requirements and subject to the written investment guidelines provided by each Client. The investment guideline information provided by each Client, together with any other information relating to the Client's overall investment requirements ("Investment Policy Statement"), will be used by Public Trust to determine the appropriate investment strategy for each client portfolio.
- Local Government Investment Pools (LGIP) - These services are provided to individual Participants within each respective LGIP on a discretionary basis, subject to each LGIP's written investment guidelines. These guidelines together with any other information relating to the LGIP's overall investment requirements ("Investment Policy Statement"), will be used by Public Trust to determine the appropriate investment strategy for each client portfolio. LGIP's managed by Public Trust are: Colorado Local Government Liquid Asset Trust ("COLOTRUST"), Michigan Cooperative Liquid Assets Securities System ("Michigan CLASS"), New York Cooperative Liquid Assets Securities System ("NYCLASS"), Texas Cooperative Liquid Assets Securities System Trust ("Texas CLASS"), Florida

Cooperative Liquid Assets Securities System (“FLCLASS”), Virginia Investment Pool Trust Fund (“VML”) and TrustINDiana.

- Term Series Investments. These services are provided on a discretionary basis to Participants within certain LGIP’s. Term Series investments adhere to the Investment Policy Statements of the respective LGIP and have an investment minimum.

Public Trust does not assume any responsibility for the accuracy of the information provided by a Client and is not obligated to verify any information received from a Client. Under all circumstances, Clients should promptly notify Public Trust in writing of any changes to their Investment Policy Statement. In the event that a Client notifies Public Trust of changes to its Investment Policy Statement, Public Trust will review such changes, perform a compliance verification to identify any non-compliant securities, and implement any necessary revisions or remedial actions to the Client's portfolio.

Public Trust invests Client assets in fixed income securities. Please refer to Item 8 for additional information about Public Trust's methods of analysis, investment strategies, and their associated risks.

Administrative and Transfer Agency Services

Public Trust provides administrative and transfer agency services to the LGIP’s of COLOTRUST, Michigan CLASS, NYCLASS, Texas CLASS, TrustINDiana, Louisiana Asset Management Pool (“LAMP”), FLCLASS and VML. Services provided include, but are not limited to, the maintenance of Participant records, transactions and account balances; and money movements based on client requests.

Fund Accounting Services

Public Trust provides fund accounting services for COLOTRUST, Michigan CLASS, NYCLASS, Texas CLASS, TrustINDiana, LAMP, FLCLASS and VML., Services provided include, the daily accounting of assets, income earned and expenses incurred to derive a daily Net Asset Value (NAV) and a daily dividend rate to be paid to Participants. Additional services provided are annual financials and Board reports.

Consulting Services

Public Trust also provides investment related consulting services to clients. Consulting services may include the following:

- Request for proposal (RFP) creation and implementation.
- Review of investment portfolio(s) and investment policies.
- Review of organization structure and functions regarding the investment activities.
- Review of investment compliance with applicable state and internally imposed requirements.

- Future investment planning strategies and implementation analysis and recommendations.
- Broker/Dealer selection assistance.
- Banking institution selection assistance.
- Investment risk analysis.

Non-Managed Account Services

Upon discretion and final approval by Public Trust, some clients may be permitted to establish one or more non-managed accounts for the purposes of client reporting. These accounts do not receive ongoing supervision and monitoring services like those provided to accounts through our Investment Advisory Services described above. Public Trust does not make any investment recommendations and will not monitor specific securities or general portfolios for these accounts. The primary purpose for this service is to include non-managed accounts owned by the client in the performance reports provided by Public Trust to certain clients. Although we do not provide on-going management services or specific investment recommendations for these accounts, non-managed accounts will be included in the performance reports that are prepared and provided to clients. Clients are solely responsible for initiating the purchase and sale of securities held in non-managed accounts. Therefore, clients with non-managed accounts, and not Public Trust or any of its employees, will have the exclusive responsibility for the performance and monitoring of the underlying securities that are purchased for, or held, in a non-managed account. Public Trust does not currently charge a fee for this service. However, clients will be required to enter into a written agreement with Public Trust, and they will be provided a copy of this disclosure brochure prior to establishing a non-managed account.

C. Client Tailored Services and Client Imposed Restrictions

Public Trust offers the same suite of services to all of its SMA clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current investment objectives (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

At the beginning of the client relationship, Public Trust contacts the client to gather and discuss information regarding their overall investment objectives and guidelines. Where applicable, an Investment policy is requested from the client and utilized to tailor the investments and objectives of the portfolio. From there we assist the client in determining the investment strategy or strategies that are best suited to meet the client's needs and objectives. Once a client has selected an investment strategy or strategies, we provide continuous supervision and management of the assets. Clients are responsible for informing us of any changes to their investment objectives and /or restrictions.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and any other administrative fees. Public Trust does not participate in any wrap fee programs.

E. Amounts Under Management

As of February 28, 2017, Public Trust had discretionary assets under management in the amount of \$21,594,727,300 and non-discretionary assets under management in the amount of \$3,148,170,276. In addition, Public Trust offers fund accounting, administrative, and transfer agency services to one LGIP with respect to assets in the amount of \$1,521,320,947.

Item 5: Fees and Compensation

A. Fee Schedule

Local Government Investment Pool (LGIP) Fees

LGIP account fees are calculated using one of the following methods:

- (Previous Closed Period's Net Asset Value) The net assets of the previous closed period (i.e. Thursday's net asset figure is utilized as the basis for the fee calculation for Friday, Saturday and Sunday. This methodology holds true for holiday days as well days that fall on a Monday through Friday) will be multiplied by the applicable fee rate(s) and divided by 365 or 366 days in the event of a leap year to equal the daily Fee accrual.
- (Current Day's Shares Outstanding) The current day's shares outstanding will be multiplied by the applicable fee rate(s) and divided by 365 or 366 days in the event of a leap year to equal the daily Fee accrual. For weekend days and holidays, the shares outstanding for the previous business day will be utilized for the calculation of the fees.
- (Ending Market Value of the Net Assets excluding accrued interest and accrued expenses) The ending market value of the net assets (excluding accrued interest and accrued expenses) of the previous business day (closed period) (i.e. Thursday's net asset figure is utilized as the basis for the fee calculation for Friday, Saturday and Sunday. This methodology holds true for holiday days as well days that fall on a Monday through Friday) will be multiplied by the applicable fee rate(s) and divided by 365 or 366 days in the event of a leap year to equal the daily Fee accrual.
- (Ending Market Value of the Net Assets excluding accrued interest and accrued expenses) The ending market value of the net assets (excluding accrued interest and accrued expenses) of the 15th day and last calendar day will be multiplied by the applicable fee rate(s) and divided by 365 or 366 days in the event of a leap year and multiplied by the number of days in the semi-monthly period to equal the monthly accrual.

Fees may be tiered or at a fixed rate depending on the Agreement for the specific LGIP. Fees may be charged up to an annual rate of 0.15%. Fees paid to Public Trust for the LGIP accounts cover portfolio management (where applicable), fund accounting, administrative and transfer agency services and can cover various auxiliary expenses, including but not limited to, legal, audit, and board expenditures. These fees are payable on a monthly basis by the client to Public Trust. Certain agreements between Public Trust and the Board of Trustees of the LGIP may allow for fees to be waived. Fees may be waived or abated at any time, or from time to time, at the sole discretion of Public Trust. Any such waived fees may be restored by the written agreement of the Board of Trustees.

Term Series Investment Fees

Term series Investment fees are based on the original principal amount invested by the Participant up to 0.15% (annualized). Fees are automatically withdrawn from the initial investment. Public Trust may waive fees without Board of Trustee approval. Early withdraw penalties will be assessed.

Separately Managed Account (SMA) Fees

SMA account fees are calculated using one of the following methods:

- average market value
- average market value plus accrued interest
- average monthly book value of the underlying net assets under management
- ending market value for the month or quarter or per portfolio

Fees will be calculated based on the number of days in the month or quarter of the billing period. Fees may be based on the number of the days in the year, (leap year, 366 days) or at a fixed basis of 365 days. Fees may be prorated if the billing period is not a full monthly or quarterly period. Fees may be charged at a fixed rate, tiered rate structure or a fixed dollar amount per billing period, based on the terms of the Investment Advisory Agreement. Certain Agreements cap fees at a maximum amount per quarter or year. Public Trust can also impose a minimum fee of up to \$1,000 per month in accordance with the Agreement. Certain states impose taxes for doing business in that state. These taxes may be collected in addition to the fees associated with services provided by Public Trust. Overall, fees are based upon the needs of the client and complexity of the situation, agreed to in writing with the client and evidenced in the final fee schedule of the executed Agreement. Fees are invoiced to the client and are paid either monthly or quarterly in arrears. Clients may terminate their contracts per the terms of their Agreement with Public Trust. Because fees are charged in arrears, no refund policy is necessary. If the Agreement is terminated by either the client or Public Trust prior to the end of a billing period, fees shall be prorated to the effective date of termination. Annual fees can be up to 0.30%, depending on a number of factors, including but not limited to, the amount of assets being managed. Fees will be collected via check, Automated Clearing House (ACH), bank wire, or paid

directly from the client's custodian account(s). Fees associated with Public Trust services are negotiated individually with each client.

Consulting Services Fees

Payment received by Public Trust providing consulting services to clients is based on the scope of work to be performed, the time frame of the work, and complexity of the work to be completed. These fees are generally charged at a fixed rate. Fees may be charged based on a percentage of net assets or at an hourly rate.

All fees charged to clients are fully described in the Investment Advisory Agreement between the client and Public Trust.

The firm may from time to time charge a fixed rate for services. The amount is negotiable and depends on the extent of services required and is mutually agreed to, in writing, by the Client and Public Trust.

B. Other Fees and Expenses

Clients should understand that the advisory fees described herein may not include certain charges imposed by third parties such as custodial fees and expenses. Client assets may also be subject to (as applicable) transaction costs, retirement plan administration fees, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

These fees and expenses are separate from and in addition to the fees charged by Public Trust. Accordingly, each Client should review all applicable fees, to fully understand the total amount of fees to be paid by the Client and to thereby evaluate the advisory services being provided.

C. Prepayment of Fees

Not Applicable.

D. Outside Compensation for the Sale of Securities to Clients

Neither Public Trust nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

Item 6: Performance-Based Fees and Side-By-Side Management

Public Trust does not charge or accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

Public Trust offers investment advisory services predominantly to state and local U.S. government entities, non-profit corporations and charitable organizations. Public Trust investment advisory clients generally include state and municipal governmental entities, non-profit corporations including hospitals, schools, colleges and cultural institutions that have raised funds through the issuance of tax exempt debt obligations

Minimum Account Size

Currently, Public Trust has only one product that has a minimum account investment. The Term Series minimum investment account amount is \$500,000.00. Public Trust evaluates all other accounts on a case by case basis.

Item 8: Methods of Analysis, Investment Strategies, and Risk of Investment Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis

Public Trust's methods of analysis include fundamental and technical analysis.

- **Fundamental analysis** - Involves the evaluation of a security that attempts to measure its intrinsic value by studying related economic, financial and other qualitative and quantitative factors.
- **Technical analysis** - Involves the examination of past market data such as prices and the volume of trading, which may provide an estimate of the future value of a security.

Investment Strategies

Public Trust has five (5) investment strategies with different investment objectives as outlined below.

Money Market - This strategy is offered only to LGIP's emphasizing convenient short-term investment opportunities carefully chosen to optimize interest earnings while at the same time maximizing safety and liquidity. Short-term, high quality fixed income securities are utilized due to their minimal credit and volatility risk with the objective of maintaining a constant \$1.00 net asset value. Typically, this strategy can invest in U.S. Treasury and Agency securities, commercial paper, repurchase agreements and bank deposits, certificates of deposit and corporate notes with a weighted average maturity (WAM) to reset of 60 days and WAM to final of 90-120 days.

Enhanced Cash - The overall objectives are to preserve capital while providing high current income with a high degree of liquidity and lower excess risk than short term benchmarks. Short-term, high quality fixed income securities are utilized due to their minimal credit and volatility risk. Generally, the weighted average maturity of the investments in this strategy can range from six to eighteen months. Typically, this strategy invests in U.S. Treasury and Agency securities, commercial paper, short-term corporate notes and bonds, and municipal bonds.

Core Assets- The overall objectives are to provide a steady stream of income with longer-term capital appreciation. High quality fixed income investments are utilized to ensure minimal credit and volatility risk. This strategy involves active management of duration, sector and security selection. Common benchmarks for this strategy can be the Merrill Lynch 1-3 and 1-5 U.S. Treasury & Agency Indexes or as specified in the client's investment policy. Typically, this strategy invests in U.S. Treasury and Agency securities as well as medium-term corporate and municipal bonds.

Bond Proceeds - For portfolios where there are liability-driven investment considerations, such as clients whose portfolios are funded with bond proceeds that are utilized to make payments associated with certain projects, we recommend securities specifically matched to meet appropriate draw schedules and we modify the portfolio as the schedule changes or as investment opportunities present themselves.

Term Series Investments– The Term Series Investment is designed to complement the daily liquidity of the underlying LGIP by offering Participants the opportunity to invest in fixed-term securities with maturities ranging between 90 and 365 days. A projected dividend rate is determined when investments are executed for each Term Series and is declared and paid on the agreed upon maturity date. Each Term Series Investment is owned by that specific Participant within the LGIP. The permissible investments for the Term Series will mirror the underlying permissible investments of the LGIP. Term Series accounts seek to return all invested principle on the selected maturity date. Early withdrawals from Term Series Investments may result in penalties.

B. Material Risks Involved

Investing involves risks, including possible loss of principal, which clients would have to bear. The investment decisions made by Public Trust for clients are subject to certain risks, and such decisions may not always be profitable. Public Trust does not guarantee returns or performance against stated benchmarks. Past performance is not a guarantee of future results. The following is a summary of common risks associated with investing in fixed-income securities.

Interest Rate Risk - A bond's price and yield share an inverse relationship. Interest rate risk may change a bond's value due to a change in the absolute level in interest rates, the spread between two rates or a shift in the yield curve. The actual degree of a bond's sensitivity to changes in interest rates depends on various characteristics of the investment such as coupon and maturity.

Credit Risk - The risk that a bond issuer may fail to make payments for which it is obligated. Public Trust focuses on an issuer's financial condition to gauge its ability to make payments of interest and principal in a timely manner. Credit risk is also gauged by quality ratings organizations such as Moody's and Standard & Poor's.

Liquidity Risk - The degree to which an investment can be sold at or near its fair value. The size of a bond's market, the frequency of trades, ease of valuation and issue size impact liquidity risk.

Market Risk - The risk that the value of securities owned may go up or down sometimes rapidly or unpredictably, due to factors affecting securities markets generally or particular industries.

Issuer Risk - The risk that the value of a security may decline for a reason directly related to the issuer, such as management performance, financial leverage and reduced demand for the issuer's goods or services.

Default Risk - The risk that a bond issuer (or counterparty) will default, by failing to repay principal and interest in a timely manner.

The market value of bonds will generally fluctuate inversely with interest rates and other market conditions prior to maturity and will equal par value at maturity. Interest rates for bonds may be fixed at the time of issuance, and payment of principal and interest may be guaranteed by the issuer and, in the case of U.S. Treasury obligations, backed by the full faith and credit of the U.S. Treasury. Since U.S. Treasury bonds have longer maturities, the market value of U.S. Treasury bonds will generally fluctuate more than U.S. Treasury bills.

Public Trust generally seeks investments that do not involve significant or unusual risk beyond the scope of the domestic high-grade fixed income universe. Public Trust believes that the common risks involved with investing in fixed income securities as outlined above can be mitigated by prudently diversifying a portfolio's holdings. Public Trust also manages these portfolio holdings in concert with the client's individual investment policy and tolerances.

C. Risks of Specific Securities Utilized

Public Trust generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international bond markets.

- **Treasury Inflation Protected/Inflation Linked Bonds:** The Risk of default on these bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal.
- **Fixed Income** is an investment that guarantees fixed periodic payments in the future that may involve economic risks such as inflationary risk, interest rate risk, default risk, repayment of principal risk, etc.

- **Debt securities** carry risks such as the possibility of default on the principal, fluctuation in interest rates, and counterparties being unable to meet obligations.
- **Short term trading** risks include liquidity, economic stability and inflation.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should recognize.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

Neither Public Trust nor any of its employees have been subject to regulatory disciplinary action.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither Public Trust nor any of our management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer. Public Trust does not recommend or select other investment advisers for clients in exchange for compensation from those advisers.

Public Trust maintains two affiliated entities; 1) PT Asset Management, LLC, a wholly owned subsidiary under common control, and 2) PT Advisors, LLC, a limited liability company organized under the laws of Colorado and registered to do business in Colorado as well as additional states. Each of these entities maintains separate client agreements for each respective entity.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Public Trust nor its representatives are registered as or have pending applications to become a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither Public Trust nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

All client assets are managed by Public Trust. The firm does not select or utilize third party managers or other advisers.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

Public Trust maintains a policy of strict compliance with the highest standards of ethical business conduct and the provisions of applicable federal securities laws, including rules and regulations promulgated by the U.S. Securities and Exchange Commission. Public Trust has adopted a written Code of Ethics that covers the following areas: Statement of General Policy, Access Persons, Chief Compliance Officer (“CCO”) Designee, Standards of Business Conduct, Protecting the Confidentiality of Client Information, Social Media, Prohibition Against Insider Trading, Preclearance, Personal Securities Transactions, Reporting Procedures, Participation in Affiliated Limited Offerings, Gifts & Entertainment, Political Contributions, Covered Associates, Rumor Mongering, Whistleblower Policy, Reporting of Violations and Sanctions, Records, and Acknowledgement. Our Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

Public Trust does not recommend that clients buy or sell any security in which a related person to Public Trust or Public Trust has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

Public Trust does not recommend that clients buy or sell any security in which a related person to Public Trust or Public Trust has a material financial interest.

D. Trading Securities At/Around the Same Time as Clients' Securities

On infrequent occasions, our personnel may buy or sell a security for their own accounts, which coincidentally is being purchased or sold for the accounts of our clients. The fixed-income securities Public Trust recommends for purchase and sale are of the type which the Securities and Exchange Commission has expressly recognized as presenting little opportunity for the type of

improper trading which compliance with the Code of Ethics reporting requirements is designed to uncover. As noted above, whenever our personnel act in a fiduciary capacity, we will endeavor to consistently put the client's interest ahead of the firm's.

Item 12: Brokerage Practices

A. Selection Criteria and Best Execution

As a fiduciary, Public Trust has an obligation to use its best efforts to seek to obtain the best available price and most favorable execution given the circumstances with respect to all portfolio transactions placed by Public Trust on behalf of our clients. This process is commonly referred to as "best execution". As part of our best execution process Public Trust evaluates broker-dealers on a variety of criteria, including, but not limited to: (i) capital strength and stability, (ii) execution capabilities, (iii) trading expertise in fixed income securities, (iv) inventory of fixed income securities, (v) liquidity, (vi) any transaction costs, and (vii) reliable and accurate communications and settlement capabilities. From the evaluation, Public Trust selects and maintains a list of brokers ("Approved Brokers") that are used for client transaction execution. To help ensure the firm is meeting our best execution obligations, Public Trust performs a periodic (no less than annually) review of our trading practices and executions.

B. Order Aggregation and Allocation

From time to time Public Trust may determine, based on a variety of reasons, that the purchase or sale of a particular security is appropriate for multiple client accounts. When this happens, we may also determine that it is appropriate in the interest of efficient and effective execution to attempt to execute the trade orders as one or more block trades (i.e. aggregate the securities to be traded for each such account into one or more trade orders). These circumstances may, in turn, give rise to actual or potential conflicts of interest among the accounts for whom the security purchase or sale is appropriate, and among the subset of those accounts actually participating in a block trade, especially if the block trade order results in a partial fill. To address these conflicts, Public Trust has adopted policies and procedures regarding allocating investment opportunities and executing block trades to provide an objective and equitable method of allocation so that all clients are treated fairly. The basic objectives of these policies and procedures are as follows:

- Public Trust will always allocate investment opportunities among clients' accounts in a fair and equitable manner based on each client's overall investment objectives and strategy, and any restrictions placed on the management of the account;
- Public Trust will only aggregate clients' trades when it believes that such aggregations are consistent with its duty to seek best execution for its clients; and

- Public Trust will strive to ensure that no single client participating in the block trade would be favored over any other participating client.
- To avoid odd lots containing small allocations, certain adjustments may be made under certain circumstances.
- Non-Discretionary accounts may or may not participate in block trades due to liquidity, availability and cash flow needs.

The Custodian, when applicable, will be chosen based on their relatively low transaction fees and their ability to perform their required duties. The Custodian provides for the safekeeping of client's assets. The choice of Custodian will be subject to periodic review by Public Trust.

C. Soft Dollar Considerations

Public Trust prohibits the use of third party soft dollar arrangements and has never entered into a soft dollar arrangement. Therefore, our customers are never charged for any soft dollar research. However, during the course of doing business we may receive research including unsolicited research from broker dealers. This information is often the same material that is made available to all of their clients and publicly available through the internet. This information is further outlined in Section 28(e) of the Securities and Exchange Act of 1934, and although customary and permitted, could possibly be deemed as an implied economic benefit. Accordingly, Public Trust has adopted written policies and procedures regarding trading and brokerage selection. The firm performs periodic reviews of all trading practices to help ensure that transactions are executed in the best interest of each individual client.

D. Directed Brokerage

In certain circumstances, Public Trust may accept written direction from a client regarding the use of a particular broker-dealer to execute some or all transactions for the client. When that happens, the client has usually negotiated terms and arrangements for the account with that broker-dealer, and Public Trust will not seek better execution services or prices from other broker-dealers. In addition, depending on the arrangement, Public Trust may not be able to aggregate a directed brokerage client's transactions with other Public Trust client transactions for the same security and Public Trust. Importantly, Public Trust will have limited ability to ensure the broker-dealer selected by the client will provide best possible execution, and thus, the client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to its duty of best execution, Public Trust may decline a client's request to direct brokerage if, in Public Trust's sole discretion, such directed brokerage arrangements would result in additional operational difficulties and not be in the best interest of the requesting client. Further, from time to time, Public Trust may examine current market information for the benefit of the client in assessing the cost versus benefit of using a directed broker.

E. Trade Errors

Public Trust has internal controls for the prevention of trade errors; however, trade errors in client accounts cannot always be avoided. Public Trust strives to correct all trade errors prior to the settlement of any transaction. Public Trust maintains records of all errors it identifies, including the original trade ticket, trade date, broker, client affected, identification of the source of the error, and the results of the error and any correction, including future preventative measures. Consistent with its fiduciary duty, it is the policy of Public Trust to correct trade errors in a manner that is in the best interest of the client. Public Trust will promptly notify the client if a trade error results in a gain or loss to the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. If the error was caused by Public Trust, the client will be made whole and any loss resulting from the trade error will be absorbed by Public Trust. If the error is caused by the broker-dealer, the broker-dealer will be responsible for covering all trade error costs. If an investment gain results from the correcting trade, the gain will remain in the client's account. Public Trust may also confer with clients to determine if the client should forego the gain (e.g., due to tax reasons).

Public Trust will never retain any portion of any gains made resulting from trade error corrections or profit in any way from trade errors. If the gain does not remain in the account, Public Trust will donate the amount to charity. Generally, if related trade errors result in both gains and losses in an account, they may be netted.

Item 13: Reviews of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

A member of Portfolio Management will review clients' accounts with regards to their investment policies, risk tolerance levels and allocations at least monthly.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations.

C. Content and Frequency of Regular Reports Provided to Clients

Custodians have been instructed to provide each client with a monthly statement and/or online access to view their custody statements. These statements detail the assets held and asset values of the client's accounts. Monthly reports and/or online access to client transaction activity, are provided to all SMA clients. These reports and online access disclose such items as portfolio returns, holdings, transactions and issuer concentrations. Monthly reports are provided to the LGIP Participants denoting their balances, transactions and income earned for the period. LGIP

custodian statements are provided to the Boards or at a minimum a contact of the LGIP on a quarterly basis.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

Public Trust does not receive any economic benefit, directly or indirectly from any third party for advice rendered to Public Trust clients.

B. Compensation to Non - Advisory Personnel for Client Referrals

Public Trust has entered into a Solicitation arrangement with a third-party firm pursuant to which representatives of their firm may offer Public Trust's services to the public. Through this arrangement, Public Trust will pay a cash referral fee to the solicitor or soliciting firm based on percentage of revenue collected from the client. The Solicitation Agreement is in writing and complies with the requirements of Rule 206(4)-3 of the Advisers Act. If a client is introduced to Public Trust by a solicitor, Public Trust will pay that solicitor a fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act and any corresponding state securities law requirements. While the specific terms of each agreement may differ, generally, the compensation will be based upon Public Trust's engagement of new clients and the retention of those clients and is calculated using a varying percentage of the fees paid to Public Trust by such clients. Any such fee shall be paid solely from Public Trust's investment management fee, and shall not result in any additional charge to the client.

Each prospective client who is referred to Public Trust under such an arrangement will receive a copy of Public Trust's firm brochure and a separate written disclosure document disclosing the nature of the relationship between the third- party solicitor and Public Trust and the amount of compensation that will be paid by Public Trust to the solicitor.

Item 15: Custody

SMA clients should receive statements on at least a quarterly basis directly from the qualified custodian that holds and maintains their assets. Clients are urged to carefully review all custodial statements and compare them to any account reports provided by Public Trust. In certain cases, our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Participants in LGIP accounts receive, at a minimum, audited financial statements within 120 days of LGIP's fiscal year end.

Item 16: Investment Discretion

For accounts where Public Trust is granted discretionary authority in writing, Public Trust will normally determine (without first obtaining client's permission for each transaction): 1) the type of securities to be bought and sold, 2) the dollar amounts of the securities to be bought and sold, 3) the broker-dealers through which transactions will be executed, 4) whether a client's transaction should be combined with those of other Clients and traded as a "block", and 5) the commission rates and/or transactions costs paid to effect the transactions.

For non-discretionary accounts, Public Trust will, for securities purchase or portfolio recommendations, provide suggestions to the client and if agreed upon for investment, will implement the transactions.

Item 17: Voting Client Securities (Proxy Voting)

Public Trust will not ask for, nor accept voting authority for client securities. Further, the types of securities purchased for clients' accounts are non-equity securities, which typically do not have voting rights.

Item 18: Financial Information

A. Balance Sheet

Public Trust does not solicit prepayment of more than \$1,200 in fees per client, six months or more in advance and therefore is not required to provide, and has not provided a balance sheet.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither Public Trust nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

Public Trust has not been the subject of a bankruptcy petition in the last ten years.