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## ***Alpha Performance Verification Services***

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### **Independent Verifier's Report on GIPS® Compliance**

Mr. Jason M. Vavra, Managing Member  
VCM Wealth

We have examined whether VCM Wealth (the "Company") (1) complied with all the composite construction requirements of the Global Investment Performance Standards (GIPS®) on a firm-wide basis for the periods January 1, 2016 through December 31, 2016, and (2) designed its policies and procedures to calculate and present performance results in compliance with the GIPS standards as of December 31, 2016. We have also conducted a performance examination of the Company's ***Balanced ETF Strategy*** for the periods January 1, 2016 through December 31, 2016.

The Company received a firm-wide GIPS verification for the periods June 1, 2009 through December 31, 2015 and the ***Balanced ETF Strategy*** was examined for the periods June 1, 2009 to December 31, 2015 by its predecessor verifier. As dictated by the GIPS, we are relying on the work of the predecessor verifier in formulating our opinion. The firm's composite presentations include returns prior to January 1, 2016 that were verified by the predecessor verifier; however, the scope of our verification is limited to the periods January 1, 2016 through December 31, 2016.

### **Management's Responsibility**

The Company's management is responsible for compliance with the GIPS standards and the design of its policies and procedures and for the compliant presentations.

### **Verifier's Responsibility**

Our responsibility is to express an opinion based on our examination. We conducted our examination in accordance with verification procedures set forth by GIPS, including the *Guidance Statements for Verification and Performance Examinations* and, accordingly, included examining, on a test basis, evidence about the Company's compliance with the above-mentioned requirements, evaluating the design of the Company's policies and procedures referred to above, examining, on a test basis, evidence supporting the accompanying compliant presentation, and performing the procedures for a verification and a performance examination set forth by the GIPS standards and such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

### **Opinion**

In our opinion, VCM Wealth has, in all material respects:

- Complied with all the composite construction requirements of the GIPS standards on a firm-wide basis for the periods January 1, 2016 through December 31, 2016; and
- Designed its policies and procedures to calculate and present performance results in compliance with the GIPS standards as of December 31, 2016.

Also, in our opinion, the compliant presentation of the Company's ***Balanced ETF Strategy*** for the periods January 1, 2016 through December 31, 2016, has been prepared and presented, in all material respects, in compliance with the GIPS standards.

This report does not relate or provide assurance on any compliant presentation other than the aforementioned composite.

Alpha Performance Verification Services  
Michael W. Hultzapple, CPA, CFA, CIPM  
March 17, 2017

**VCM WEALTH**  
**BALANCED ETF STRATEGY**  
**ANNUAL DISCLOSURE PRESENTATION**

Year	Total Firm Assets	Composite Assets	Number	Annual Performance Results Composite	Annual Performance Results Composite	Blended Index	Composite Standard Deviation	Benchmark Standard Deviation	Composite Dispersion
End	(USD) (millions)	(USD) (millions)	of Accounts	Gross (as a percentage)	Net (as a percentage)	(as a percentage)	(as a percentage)	(as a percentage)	(as a percentage)
2016	38.4	24.3	36	8.89	7.81	5.92	7.88	6.69	0.42
2015	32.7	21.6	41	(3.48)	(4.44)	(0.98)	7.99	6.68	0.63
2014	34.5	14.2	39	5.65	4.61	4.96	7.21	6.49	0.73
2013	33.0	10.9	32	13.70	12.56	12.32	9.15	8.31	1.40
2012	23.6	8.5	27	12.38	11.27	11.48	10.73	9.93	0.74
2011	19.6	6.8	23	(1.41)	(2.39)	(1.13)	n/a	n/a	1.01
2010	14.5	6.2	21	11.94	10.84	10.77	n/a	n/a	1.46

n/a – Three-year annualized ex-post standard deviation of the composite and benchmark are not presented because 36 monthly returns are not available.

**Balanced ETF Strategy:** *The Balanced ETF Strategy's main objective is to achieve a balanced return by investing in a combination of asset classes. The portfolio consists of multiple exchange traded funds (ETFs) and is invested through the use of a disciplined research process. The asset allocation of this strategy is a distinct and differentiating factor. The composite is allocated 60% to the global equity markets and 40% to the global fixed income markets. The inception date is June 1, 2009 with a creation date of January 1, 2015. The benchmark consists of 60% MSCI All World Index (net of all tax withholding), 40% Barclays US Aggregate Bond Index, blended monthly. The allocation may include ETF's that invest in REITs, commodities, and liquid alternatives.*

VCM Wealth claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. VCM Wealth has been independently verified for the period of June 1, 2009 through December 31, 2015.

Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. The Balanced ETF Strategy has been examined for the periods of June 1, 2009 through December 31, 2015. The verification and performance examination reports are available upon request.

VCM Wealth is a dba of Vavra Capital Management, LLC, which is a Pennsylvania, New Jersey and Delaware state registered investment advisory firm. VCM Wealth is a client focused company that provides personalized investment management, retirement plan, financial planning, consulting and insurance services to institutional and individual clients.

VCM Wealth provides an array of wealth management services to institutional and individual clients. Utilizing a comprehensive financial planning approach, which includes analyzing current market conditions, the client's financial position, risk tolerance, and future spending need, our goal is to create a comprehensive long-term financial plan that will help clients achieve their long-term financial goals.

VCM Wealth also provides institutional asset management services to other registered investment advisors utilizing a separate account management product.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Composite performance is presented net of foreign withholding taxes on dividends, interest income, and capital gains. Past performance is not indicative of future results.

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 the highest management fee applicable for accounts in this composite. The annual composite dispersion presented is an asset-weighted standard deviation calculated for the accounts in the composite the entire year. Policies for valuing portfolios, calculating performance, and preparing compliant presentations are available upon request. A list of composite descriptions is available upon request.

The maximum investment management fee for the composite is 1.00%. Actual investment advisory fees incurred by clients may vary.