FELRA and UFCW
Benefit Funds

Compliance Report

June 30, 2019

Investment Performance Services, LLC

Fixed Income Separate Account Quarterly Compliance Checklist
Period Ending June 30, 2019

To: Segall Bryant & Hamill

Re: FELRA & UFCW Benefit Funds - Fixed Income B2F9853 & B2F9853 T

As an authorized representative of the firm I certify the following answers are accurate and attest that our firm has provided/attached all required explanations and/or supporting documents.

Part A: Account

1.) Do you verify the portfolio and individual holdings are currently, and have been during the past quarter, in compliance with the Fund's investment policy statement? Please attach a comparison of each of the Fund's objectives and guidelines and each permitted range to the actual allocation for each guideline or range at the end of the quarter to illustrate compliance with the investment policy guidelines. Also include the Client specific Quarter 1, 3 and 5 year returns and statement of assets including market values and bond ratings.

Yes **No (please explain)**

2.) With respect to the portfolio(s) under your management, do you acknowledge sole fiduciary responsibility under ERISA for adherence with the Fund's investment policy?

Yes **No (please explain)**

3.) Do you see a need for a change in the Fund's current investment policy statement under which you are working?

No **Yes (please explain)**

4.) In regard to derivative securities that may be held in the portfolio, do you attest that the following statements are true?

- The March 28, 1996, Letter of Guidance and Statement on Derivatives has been read and reviewed by personnel of this firm. We accept full responsibility for complying with all aspects of derivative investment outlined therein.
- Specific examples of types of derivatives include but are not limited to the following:
  - Structured Finance
  - Collateralized Debt Obligations (CDO)
  - Structured Commercial Mortgage Obligations
  - Collateralized Mortgage Obligations (CMO)
  - Collateralized Loan Obligations (CLO)
  - Structured Asset-Backed Obligations
- A complete list of derivatives securities utilized in the Fund's portfolio since our last certification is attached to this certification. In our judgment, these investments are prudent, in the best interest of the Fund and its participants, and are in compliance with the investment policy and guidelines of the Fund.

- We certify that the subject derivatives are considered by this firm as suitable for the Fund given known actuarial and economic factors. In our analysis of the suitability of derivatives for the Fund, these positions have been stress tested under varying interest rate scenarios.
- Our firm has experienced personnel in place and the investment processes and the controls to prudently invest in the derivatives listed.

$\boxed{\text{Yes}}$ No (please explain)

Attached is a list of securities that may fall into one of the derivative types listed above

5.) Is the investment management fee charged by your firm to the Fund consistent with the fee schedule in the investment management contract? Is the fee charged by your firm to the Fund consistent with the fee charged by your firm to other funds of a similar size and the most competitive fee offered by your firm?

$\boxed{\text{Yes}}$ No (please explain)

We believe the fee for this client is competitive and appropriate based on the individual circumstances of this client relationship. As such, SBH may offer a different fee schedule to other clients based on their individual circumstances, which may include style, size, specific objectives, etc.

6.) Have you confirmed that the Qualified Institutional Buyer requirements for the above client have been met for the purchases 144a securities?

$\boxed{\text{Yes}}$ No (please explain)

Part B: Firm

1.) Have significant changes been made in the firm's investment management process during the quarter?

$\boxed{\text{No}}$ Yes (provide details)

2.) Have any changes or departures occurred in the investment team or other key personnel within the firm during the past quarter?

$\boxed{\text{No}}$ Yes (provide details)

3.) Have any ownership changes in the firm occurred during the quarter?

$\boxed{\text{No}}$ Yes (provide details)

4.) Have there been significant changes to your Form ADV from the last copy delivered to the Fund? **<u>If you are not required to file form ADV, please explain why.</u>**

$\boxed{\text{No}}$ Yes (provide details)

5.) Has your firm or any individual (employee) at the present or during the past quarter been named in litigation, a regulatory enforcement action, or investigation related to investment activities? Please include any updates on any pending litigation that has been previously reported.

$\boxed{\text{No}}$ Yes (provide details and current status)

6.) Has your firm reviewed all regulations and directives from the Securities and Exchange Commission concerning brokerage and research services and are you in compliance with all disclosure requirements?

$\boxed{\text{Yes}}$ **No (please explain)**

7.) Has your firm reviewed the DOL's final ruling on cross-trading of securities and are you in compliance with the ruling?

$\boxed{\text{Yes}}$ **No (please explain)**

8.) Have any changes occurred in the Errors and Omission insurance coverage provided by your firm over the last quarter?

$\boxed{\text{No}}$ **Yes (provide details)**

9.) Does the amount of insurance coverage meet or exceed the minimum amount required through your investment management contract with the Fund and the minimum amount required through the Fund's Investment Policy Statement?

$\boxed{\text{Yes}}$ **No (please explain)**

10.) Is your firm adhering to the communication and reporting requirements as defined in the Fund's investment policy statement?

$\boxed{\text{Yes}}$ **No (please explain)**

11.) Is your firm achieving best execution for the Fund on all transactions involving Fund assets?

$\boxed{\text{Yes}}$ **No (please explain)**

Subject only to a client's direction to use a particular broker or dealer for the execution of transactions for that client's account, SBH's overriding objective in selecting brokers and dealers to effect client transactions is to seek the best combination of net price and execution. The best net price, giving effect to brokerage commission, if any, is an important factor in this decision; however, a number of other judgmental factors also may enter into the decision. These factors include SBH's knowledge of negotiated commission rates currently available and other current transaction costs; the nature of the security being purchased or sold; the size of the transaction; the particular security; confidentiality; the execution, clearance and settlement capabilities of the broker or dealer selected and others considered; SBH's knowledge of the financial condition of the broker or dealer selected and such other brokers and dealers; and, SBH's knowledge of actual or apparent operational problems of any broker or dealer. Recognizing the value of these factors, SBH may cause a client to pay brokerage commission in excess of that which another broker might have charged for effecting the same transaction.

Standard Holdings
Expanded

Portfolio: B2F9853 *
Pricing Date: 06/28/2019
Representative: interm-comp ips
Table 1 : Excl. Table 2 Hldgs

Currency: USD
FILTER APPLIED: (Portfolio: 20 of 147)

Par (000)	Identifier	Ticker (Home)	Issuer Name	Sect	Industry	Mdys	S&P	Coupon	Maturity	Curr	Price	Mkt Val (000)	% Held (MV)	YTW	Mod Dur	Eff Dur	Conv
40	3137BAHA		FHLMC K-715- A2	CMBS	CMBS	AGY	AGY	2.856	01/25/2021	USD	100.669	40	3.51	2.398	1.405	1.408	0.015
14	3137ALJE		FHLMC 3994- AE	CMO	SEQ	AGY	AGY	1.625	02/15/2022	USD	99.434	14	1.20	2.094	1.084	1.128	0.001
190	05522RCW	BACCT	BA CC TR 2017-1A- A	ABS	CARD	Aaa	N/A	1.950	08/15/2022	USD	99.798	190	16.73	2.246	0.701	0.702	0.004
125	3137AYCE		FHLMC K25- A2	CMBS	CMBS	AGY	AGY	2.682	10/25/2022	USD	101.946	128	11.26	2.009	3.062	3.124	0.064
40	47788EAC		JOHN DEERE 2018-B- A3	ABS	EQPT	Aaa	N/A	3.080	11/15/2022	USD	101.348	41	3.58	2.392	1.895	1.895	0.028
65	14041NFK	COMET	CAP ONE MT 2017-1- A	ABS	CARD	N/A	AAA	2.000	01/15/2023	USD	99.834	65	5.73	2.245	0.701	0.702	0.004
110	92348XAA		VERIZON 2018-A- A1A	ABS	MISC	Aaa	AAA	3.230	04/20/2023	USD	101.926	112	9.89	2.199	1.817	1.817	0.025
60	12652VAC		CNH EQPT 2018-A- A3(U)	ABS	EQPT	N/A	AAA	3.120	07/15/2023	USD	101.306	61	5.36	3.120	2.640	2.640	0.000
130	14041NFN	COMET	CAP ONE MT 2017-4A- A	ABS	CARD	N/A	AAA	1.990	07/15/2023	USD	99.865	130	11.45	2.112	1.187	1.191	0.011
120	3137B5KW		FHLMC K035- A2	CMBS	CMBS	AGY	AGY	3.458	08/25/2023	USD	105.100	126	11.15	1.989	3.740	3.803	0.089
1	31397MHG		FNMA 2008-070- BY	CMO	SEQ	AGY	AGY	4.000	08/25/2023	USD	100.890	1	0.05	2.495	0.752	0.809	0.004
2	31395BD7		FNMA 2006-022- CE	CMO	SEQ	AGY	AGY	4.500	08/25/2023	USD	102.834	2	0.22	2.551	1.567	1.585	0.019
18	31393YZS		FNMA 2004-044- LT	CMO	SEQ	AGY	AGY	4.500	06/25/2024	USD	104.091	18	1.63	2.191	1.855	1.840	0.024
111	3137FBTA	FHMS	FHLMC K-728- A2	CMBS	CMBS	AGY	AGY	3.064	08/25/2024	USD	104.027	116	10.20	2.185	4.626	4.696	0.128
2	31395HJ4		FHLMC 2877- AL	CMO	SEQ	AGY	AGY	5.000	10/15/2024	USD	104.281	2	0.18	2.367	1.655	1.633	0.024
15	31395WHN		FHLMC 3005- ED	CMO	SEQ	AGY	AGY	5.000	07/15/2025	USD	105.245	15	1.35	2.324	1.976	1.928	0.024
0	3128QSP8	FMCC	FHLMC POOL - 1G2247	PASS	ARM	AGY	AGY	4.525	10/01/2037	USD	105.372	0	0.02	3.298	4.867	0.370	-0.048
42	3137A5MM		FHLMC 3795- ED	CMO	PAC	AGY	AGY	3.000	10/15/2039	USD	101.867	43	3.82	2.089	2.125	1.804	-0.297
7	31392GEK		FNMA 2002-090- A1	CMO	SEQ	AGY	AGY	6.500	06/25/2042	USD	114.591	8	0.68	2.082	3.272	2.775	-0.128
20	31394AB4		FNMA 2004-W11- 1A2	CMO	SEQ	AGY	AGY	6.500	05/25/2044	USD	114.528	23	2.00	2.376	3.395	2.770	-0.153
1,110						**Aaa**	**AA+**	**2.815**	**2.427**		**102.007**	**1,134**	**100.00**	**2.217**	**2.214**	**2.207**	**0.022**

Standard Holdings
Expanded

Portfolio: B2F9853T.
Pricing Date: 06/28/2019
Representative:
Table 1 : Excl. Table 2 Hldgs

Currency: USD
FILTER APPLIED: (Portfolio: 3 of 7)

Par (000)	Identifier	Ticker (Home)	Issuer Name	Sect	Industry	Mdys	S&P	Coupon	Maturity	Curr	Price	Mkt Val (000)	% Held (MV)	YTW	Mod Dur	Eff Dur	Conv
15	1266944E		CWMBS CHL 2006-HYB3- 3A1A	CMO	FLT	N/A	NR	3.675	05/20/2036	USD	95.255	15	41.47	1.781	4.454	0.497	-0.055
6	36186LAB		GMACM HEL 2007-HE02- A2	ABS	HEL	Caa3	NR	0.061	12/25/2037	USD	99.869	6	16.58	5.887	1.319	1.194	-0.260
12	31393LFK		FHLMC T054 RP02-R1 2A1	CMO	SEQ	AGY	AGY	6.500	02/25/2043	USD	118.737	15	41.94	2.618	4.617	4.670	0.166
33						**A2**	**AA+**	**4.089**	**4.304**		**104.738**	**35**	**100.00**	**2.813**	**4.002**	**2.363**	**0.004**

Summary Report

Report: Summary
Currency: Base Currency

Portfolio	20%G0QA 80%B1AO	B E 1-3 YR G/C INDEX	B E INTERM G/C INDEX	B2F9853 *	B2F9853T.
Pricing Date	06/28/2019	06/28/2019	06/28/2019	06/28/2019	06/28/2019
Rep				interm-comp ips	
# Bonds	2,279	1,573	4,721	147	7
Base Currcy	USD	USD	USD	USD	USD
Cash (000)	0	0	0	99	5
Par (000)	7,176,805	4,520,557	11,429,021	12,438	242
Mkt Val (000)	1,000,000	4,589,285	11,799,136	12,836	44
Quality	Aa1	Aa1	Aa2	Aa3	A1
Mdys	Aa1	Aa1	Aa2	Aa3	A1
S&P	AA	AA	AA-	AA-	AA+
Coupon	2.428	2.414	2.703	2.961	0.708
Coupon (Mkt)	2.469	2.431	2.737	2.994	4.210
Curr Yield	2.427	2.395	2.639	2.888	3.889
Maturity (Yrs)	1.675	1.988	4.308	4.294	3.715
Avg Life	1.669	1.978	4.275	4.238	3.712
YTM	2.020	1.962	2.130	2.267	3.542
YTW	2.014	1.955	2.123	2.257	3.542
OAS	15	14	30	39	275
Mod Dur	1.616	1.919	3.932	3.907	3.428
Eff Dur	1.601	1.900	3.912	3.821	2.121
Conv	0.019	0.024	0.109	0.064	0.008
Spread Dur	0.546	0.622	1.558	2.783	3.579

Portfolio	20%G0QA 80%B1AO	B E 1-3 YR G/C INDEX	B E INTERM G/C INDEX	B2F9853 *	B2F9853T.
Quality					
Aaa % Held (MV)	77.41	74.64	67.08	8.22	43.96
Aa % Held (MV)	4.43	4.29	3.59	49.99	
A % Held (MV)	9.41	10.89	13.28	24.07	
Baa % Held (MV)	8.75	10.18	16.05	17.72	
Caa % Held (MV)					13.12
N/A % Held (MV)					42.93

Portfolio	20%G0QA 80%B1AO	B E 1-3 YR G/C INDEX	B E INTERM G/C INDEX	B2F9853 *	B2F9853T.
Eff Dur					
<0.00 % Held (MV)					
0.00 - 0.99 % Held (MV)	22.61	1.11	0.51	10.37	44.44
1.00 - 1.99 % Held (MV)	43.81	56.14	21.90	16.54	15.34
2.00 - 2.99 % Held (MV)	33.58	42.75	18.44	16.47	
3.00 - 3.99 % Held (MV)			15.08	13.72	7.05
4.00 - 4.99 % Held (MV)			13.53	11.23	33.17
5.00 - 5.99 % Held (MV)			11.53	9.23	
6.00 - 6.99 % Held (MV)			9.13	12.14	
7.00 - 7.99 % Held (MV)			6.88	6.77	
8.00 - 8.99 % Held (MV)			3.00	3.54	
9.00 - 9.99 % Held (MV)					
10.00+ % Held (MV)					
Maturity (Yrs)					
<0.00 % Held (MV)					
0.00 - 0.99 % Held (MV)	20.02	0.02	0.01	9.65	13.01
1.00 - 1.99 % Held (MV)	43.24	52.31	20.35	15.97	13.12
2.00 - 2.99 % Held (MV)	36.69	46.08	17.96	7.67	
3.00 - 3.99 % Held (MV)	0.05	1.58	13.39	17.03	7.90
4.00 - 4.99 % Held (MV)			13.83	12.78	32.80
5.00 - 6.99 % Held (MV)			18.40	17.53	33.17
7.00 - 9.99 % Held (MV)			16.06	18.56	
10.00 - 14.99 % Held (MV)			0.00	0.82	
15.00 - 19.99 % Held (MV)					
20.00 - 24.99 % Held (MV)					
25.00+ % Held (MV)					

Sector Report

Report: Distribution
Currency: Base Currency

Portfolio	CASH % Held (MV)	TSY % Held (MV)	AGY % Held (MV)	SOVG % Held (MV)	SUPR % Held (MV)	OGVT % Held (MV)	PROV % Held (MV)	IND % Held (MV)	FIN % Held (MV)	UTIL % Held (MV)	PASS % Held (MV)	ARM % Held (MV)	CMO % Held (MV)	ABS % Held (MV)	CMBS % Held (MV)	MUNI % Held (MV)	MM % Held (MV)	OTHR % Held (MV)
20%G0QA80%B1AO		70.68	5.59	1.02	2.31	0.16	0.36	10.13	8.91	0.85								
B E 1-3 YR G/C INDEX		66.54	5.46	0.47	3.29	0.07	0.51	12.09	10.63	0.94								
B E INTERM G/C INDEX		61.54	3.84	0.91	2.40	0.12	0.51	16.97	12.27	1.43								
B2F9853 *	0.77	20.38	8.46			3.67		34.11	4.93	8.50	8.40	0.00	0.98	4.66	3.19	1.96	0.00	
B2F9853T.	10.79								3.08				65.97	13.12				7.05

SEGALL BRYANT & HAMILL

Short Name	Report Heading1	Classification Member Name	Perf Start Date	End Valuation Date	MTD Gross	MTD Net	QTD Gross	QTD Net	YTD Gross	YTD Net	1Yr Gross	1Yr Net	3Yr Gross	3Yr Net	5Yr Gross	5Yr Net	10Yr Gross	10Yr Net	Incep Ann Gross	Incep Ann Net
B2F9853 *	FELRA & UFCW VEBA Fund	Total	11/1/2008	6/30/2019	0.79	0.79	2.22	2.17	4.67	4.57	6.88	6.66	2.14	1.93	2.51	2.31	3.8	3.59	4.5	4.31
B2F9853 *	FELRA & UFCW VEBA Fund	Alternative	11/1/2008	6/30/2019	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B2F9853 *	FELRA & UFCW VEBA Fund	Fixed Income	11/1/2008	6/30/2019	0.98	0.98	2.44	2.44	4.91	4.91	7.13	7.13	2.18	2.2	2.6	2.61	3.91	3.91	4.80	4.80
B2F9853 *	FELRA & UFCW VEBA Fund	Equity	11/1/2008	6/30/2019	0.00	0.00	0.00	0.00	0.00	0.00										
B2F9853 *	FELRA & UFCW VEBA Fund	Cash	11/1/2008	6/30/2019	0.22	0.22	0.39	0.39	1.02	1.02										
B2F9853 *	FELRA & UFCW VEBA Fund	Barclays Capital US Aggregate	11/1/2008	6/30/2019	1.26	1.26	3.08	3.08	6.11	6.11	7.87	7.87	2.31	2.31	2.95	2.95	3.90	3.90	4.51	4.51
B2F9853T.	FELRA & UFCW VEBA Fund - Illiquid	Total	11/1/2008	6/30/2019	0.65	0.65	2.64	2.62	4.67	4.62	7.27	7.16	8.63	8.52	7.2	7.1	18.15	18.08	12.46	12.39
B2F9853T.	FELRA & UFCW VEBA Fund - Illiquid	Alternative	11/1/2008	6/30/2019	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0	23.77	23.77	18.32	18.32
B2F9853T.	FELRA & UFCW VEBA Fund - Illiquid	Fixed Income	11/1/2008	6/30/2019	0.71	0.71	2.90	2.90	5.04	5.04	7.68	7.68	8.89	8.89	7.34	7.34	18.01	18.01	12.17	12.17
B2F9853T.	FELRA & UFCW VEBA Fund - Illiquid	Equity	11/1/2008	6/30/2019	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-0.39	-0.39	-1.82	-1.82	-1.82	-1.82
B2F9853T.	FELRA & UFCW VEBA Fund - Illiquid	Cash	11/1/2008	6/30/2019	0.19	0.19	0.34	0.34	0.93	0.93	2.57	2.57	1.04	-6.12	0.62	-14.21	3.11	-7.90	2.93	-7.48
B2F9853T.	FELRA & UFCW VEBA Fund - Illiquid	Barclays Capital US Intermed Gov/Credit	11/1/2008	6/30/2019	1.07	1.07	2.59	2.59	4.97	4.97	6.93	6.93	1.99	1.99	2.39	2.39	3.24	3.24	3.78	3.78

Certified for the Firm By:

Name: Paul Lythberg

Signature:

Title: Chief Compliance Officer/Chief Operating Officer

Firm: Segall Bryant & Hamill

Date: July 15, 2019

Investment Performance Services, LLC
Fixed Income Separate Account Quarterly Compliance Checklist
Period Ending June 30, 2019

To: Chartwell Investment Partners

Re: FELRA & UFCW Benefit Funds -Fixed Income- Short Term High Yield- Account 542

As an authorized representative of the firm I certify the following answers are accurate and attest that our firm has provided/attached all required explanations and/or supporting documents.

Part A: Account

1.) Do you verify the portfolio and individual holdings are currently, and have been during the past quarter, in compliance with the Fund's investment policy statement? Please attach a comparison of each of the Fund's objectives and guidelines and each permitted range to the actual allocation for each guideline or range at end of the quarter to illustrate compliance with the investment policy guidelines. Also include the Client specific Quarter, 1, 3 and 5 year returns and statement of assets including market values and bond ratings.

Yes **No (please explain)**

Comparison, returns and statement will follow under separate spreadsheet and separate cover.

2.) With respect to the portfolio(s) under your management, do you acknowledge sole fiduciary responsibility under ERISA for adherence with the Fund's investment policy?

Yes **No (please explain)**

3.) Do you see a need for a change in the Fund's current investment policy statement under which you are working?

No **Yes (please explain)**

4.) In regard to derivative securities that may be held in the portfolio, do you attest that the following statements are true?

- The March 28, 1996, Letter of Guidance and Statement on Derivatives has been read and reviewed by personnel of this firm. We accept full responsibility for complying with all aspects of derivative investment outlined therein.
- Specific examples of types of derivatives include but are not limited to the following:
  - Structured Finance
  - Collateralized Debt Obligations (CDO)
  - Structured Commercial Mortgage Obligations
  - Collateralized Mortgage Obligations (CMO)
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  - Structured Asset-Backed Obligations
- A complete list of derivatives securities utilized in the Fund's portfolio since our last

certification is attached to this certification. In our judgment, these investments are prudent, in the best interest of the Fund and its participants, and are in compliance with the investment policy and guidelines of the Fund.

- We certify that the subject derivatives are considered by this firm as suitable for the Fund given known actuarial and economic factors. In our analysis of the suitability of derivatives for the Fund, these positions have been stress tested under varying interest rate scenarios.
- Our firm has experienced personnel in place and the investment processes and the controls to prudently invest in the derivatives listed.

Yes **No (please explain)**

5.) Is the investment management fee charged by your firm to the Fund consistent with the fee schedule in the investment management contract? Is the fee charged by your firm to the Fund consistent with the fee charged by your firm to other funds of a similar size and the most competitive fee offered by your firm?

Yes **No (please explain)**

It is consistent with the fees paid by other funds of a similar size, and it is the most competitive fee available for this account based on our evaluation of characteristics for a fund of this nature.

6.) Have you confirmed that the Qualified Institutional Buyer requirements for the above client have been met for the purchases 144a securities?

Yes **No (please explain)**

Part B: Firm

1.) Have significant changes been made in the firm's investment management process during the quarter?

No **Yes (provide details)**

2.) Have any changes or departures occurred in the investment team or other key personnel within the firm during the past quarter?

No **Yes (provide details)**

During the second quarter of 2019, Jared Marks and Thomas Mattsson joined Chartwell as Research Analysts for our Small & Mid Cap Value strategies.

3.) Have any ownership changes in the firm occurred during the quarter?

No **Yes (provide details)**

4.) Have there been significant changes to your Form ADV from the last copy delivered to the Fund? **If you are not required to file Form ADV, please explain why.**

No **Yes (provide details)**

5.) Has your firm or any individual (employee) at the present or during the past quarter been named in litigation, a regulatory enforcement action, or investigation related to investment activities? Please include any updates on any pending litigation that has been previously reported.

No **Yes (provide details and current status)**

6.) Has your firm reviewed all regulations and directives from the Securities and Exchange Commission concerning brokerage and research services and are you in compliance with all disclosure requirements?

Yes **No (please explain)**

7.) Has your firm reviewed the DOL's final ruling on cross-trading of securities and are you in compliance with the ruling?

Yes **No (please explain)**

8.) Have any changes occurred in the Errors and Omission insurance coverage provided by your firm over the last quarter?

No **Yes (provide details)**

9.) Does the amount of insurance coverage meet or exceed the minimum amount required through your investment management contract with the Fund and the minimum amount required through the Fund's Investment Policy Statement?

Yes **No (please explain)**

10.) Is your firm adhering to the communication and reporting requirements as defined in the Fund's investment policy statement?

Yes **No (please explain)**

11.) Is your firm achieving best execution for the Fund on all transactions involving Fund assets?

Yes **No (please explain)**

Certified For The Firm By:

Name: Melissa L. Haupt

Signature:

Melissa L. Haupt

Title: Director of Client Administration
Firm: Chartwell Investment Partners

Date: 7/11/19

Investment Performance Services, LLC
Real Estate Quarterly Compliance Checklist
Period Ending June 30, 2019

To: American Realty Advisors

Re: FELRA and UFCW Health and Welfare Fund - Real Estate - American Core Realty Fund - Acct No. 1145

As an authorized representative of the firm I certify the following answers are accurate and attest that our firm has provided/attached all required explanations and/or supporting documents.

Part A: Account

1.) Do you verify the portfolio is currently, and has been during the past quarter, in compliance with your firm's commingled investment vehicle guidelines and/or offering document governing the management of the investment?

Yes

2.) With respect to the portfolio(s) under your management, do you acknowledge sole fiduciary responsibility under ERISA for adherence with the commingled investment vehicle and/or offering document guidelines?

Yes

3.) Has there been a significant change in the liquidity of the commingled investment vehicle which may cause you to suspend, limit, or change the current liquidity offered to investors?

No

4.) Do you see a need for a change in the Fund's current investment policy statement under which you are working?

No

5.) In regard to derivative securities that may be held in the portfolio, do you attest that the following statements are true?

- The March 28, 1996, Letter of Guidance and Statement on Derivatives has been read and reviewed by personnel of this firm. We accept full responsibility for complying with all aspects of derivative investment outlined therein.
- We certify that the subject derivatives are considered by this firm as suitable for the Fund given known actuarial and economic factors. In our analysis of the suitability of derivatives for the Fund, these positions have been stress tested under varying interest rate scenarios.
- Our firm has experienced personnel in place and the investment processes and the controls to prudently invest in the derivatives.

This is not applicable as no derivative securities were held in the portfolio during Second Quarter 2019.

Part B: Firm

1.) Have significant changes been made in the firm's investment management process during the quarter?

No

2.) Have any changes or departures occurred in the investment team or other key personnel within the firm during the past quarter?

No

3.) Have any ownership changes in the firm occurred during the quarter?

No

4.) Have there been significant changes to your Form ADV from the last copy delivered to the Fund?

No

5.) Has your firm or any individual (employee) at the present or during the past quarter been named in litigation, a regulatory enforcement action, or investigation related to investment activities? Please include any updates on any pending litigation that has been previously reported.

No

6.) Have any changes occurred in the Errors and Omission insurance coverage provided by your firm over the last quarter?

No material changes have occurred.

7.) Does the amount of insurance coverage meet or exceed the minimum amount required through your investment management contract with the Fund and the minimum amount required through the Fund's Investment Policy Statement?

Yes

8.) Is your firm adhering to the communication and reporting requirements as defined in the Fund's investment policy statement?

Yes

Certified For The Firm By:

Name: Kristin Adrian

Signature: Kristin Adrian

Title: Chief Compliance Officer

Firm: American Realty Advisors

Date: July 8, 2019