

January 25, 2019

**Separate Account Client Letter  
Fourth Quarter 2018**

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For the year ended December 31, 2018, Broad Run's Focus Equity Separate Accounts<sup>1</sup> returned -8.8% net of fees<sup>2</sup> compared to -5.2% for the Russell 3000 Index. For the fourth quarter, the Focus Equity Separate Accounts returned -12.8% net of fees compared to -14.3% for the Russell 3000 Index. The performance for your account will differ somewhat from these reported results due to variations in holdings and other client-specific circumstances. We remind you that we manage your account for long-term results, so we encourage you to evaluate its performance over a multi-year time frame. Long-term performance is presented at the end of this letter.

As we have discussed before, investment returns for equities can be broken down into three factors: growth in earnings, dividends, and change in valuation. In the short term, change in valuation can have a meaningful impact on investment results, but longer term, change in valuation becomes much less important as growth in earnings and dividends accumulate to drive the majority of results<sup>3</sup>.

For this reason, as long-term investors, our analytical focus is on trying to understand a business's future earnings and dividends. We track how these metrics develop at each business we own, in aggregate across all the businesses we own, and at the portfolio level taking into account the impact of cash. This analysis helps us understand how these businesses are performing by providing a measure of progress independent of the vicissitudes of the stock market<sup>4</sup>. Each year end we report a summary of this information to give you additional perspective on your investment with us.

Please note, in this letter when we refer to "earnings" or "EPS" for our businesses, we mean earnings on a per-share basis, adjusted for certain items. We make these adjustments to get to, what we believe to be, a better measure of the true economic earnings of the businesses. Please see footnote five for additional information about our methodology<sup>5</sup>.

### *2018 Business Results*

In 2018 our businesses made good fundamental progress. In aggregate, we calculate they grew EPS 25% and paid a 1% dividend. This compares to 21% EPS growth and a 2% dividend for the Russell 3000 Index. 2018 was a particularly strong EPS growth year partially due to the change in the corporate tax rate. We estimate that 7% of the EPS growth in our portfolio was attributable to the tax change, and 18% was due to non-tax related improvement.

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<sup>1</sup> See the end of this letter for historical performance and important disclosures.

<sup>2</sup> Net of highest applicable fee of 1.0% per annum as described in our Form ADV, Part 2A.

<sup>3</sup> For more detailed discussion, please see our Second Quarter 2016 Separate Account letter.

<sup>4</sup> While this is not particularly useful to measuring progress at many types of investment strategies - for example, a high valuation-high growth strategy, a slow/no growth-deep value strategy, or a high turnover strategy - we do believe it is instructive for our long-term, business-focused strategy where we typically pay market-level valuations for businesses we believe have above-average growth.

<sup>5</sup> Earnings and EPS for the Focus Equity Strategy and its underlying holdings are based upon Broad Run's calculations/estimates, with adjustments for certain amortization expenses, excess depreciation expenses, and non-recurring charges, among other items. For balance sheet-centric companies, change in book value per share, or change in Net Asset Value per share may be used to measure fundamental progress rather than EPS. EPS for the holdings/portfolio refers to aggregated EPS of individual businesses based upon their quarter-end weightings in the Focus Equity Separate Accounts. The source for Russell 3000 Index EPS is FactSet "recurrent earnings" which include consensus adjustments to reported accounting earnings. Broad Run's calculations/estimates may differ materially from consensus. Results for the most recent year are preliminary, subject to adjustment as annual reporting is finalized. Contact us for additional detail.

	2018		2018		EPS Growth +
	<u>EPS Growth</u>		<u>Dividend Yield</u>		<u>Dividend Yield</u>
Our Businesses	25%	+	1%	=	26%
Russell 3000 Index	21%	+	2%	=	23%

Every business we own had EPS growth for the year. Four of our businesses grew at a single digit rate, four grew at 10 to 20%, and thirteen grew in excess of 20%.

### *Longer-Term Business Results & Investment Performance*

In the table below, we add 2018 results to the historical EPS growth and dividend yields for the businesses owned by the portfolio (column A). In addition, we include the impact of any cash held in the portfolio (B) to bridge the gap between business level and portfolio level fundamental results (C). We include portfolio market performance (D & E), and corresponding fundamental and market performance for the Russell 3000 (F & G).

Year	Focus Equity Separate Accounts					Russell 3000 Index	
	A	B	C	D	E	F	G
	Business Level EPS Growth + Dividend Yield*	Impact of Cash Balance	Portfolio Level EPS Growth + Dividend Yield*	Total Return Gross of Fees	Total Return Net of 1% Fee	EPS Growth + Dividend Yield	Total Return
2010	29%	-0.9%	28%	26%	25%	43%	17%
2011	19%	-1.2%	18%	5%	4%	16%	1%
2012	18%	-1.7%	17%	18%	17%	9%	16%
2013	18%	-1.1%	16%	38%	37%	8%	34%
2014	20%	-0.7%	19%	12%	11%	8%	13%
2015	12%	-0.3%	12%	5%	4%	2%	0%
2016	4%	-0.2%	4%	10%	9%	2%	13%
2017	13%	-0.5%	12%	23%	22%	13%	21%
2018	26%	-0.2%	26%	-8%	-9%	23%	-5%
Cumulative:	324%		300%	221%	194%	207%	169%
Annualized:	17.4%		16.7%	13.8%	12.7%	13.3%	11.6%

\* For the Focus Equity Separate Accounts, EPS growth is a Broad Run estimate based upon reported results for the first three quarters of the most recent year and projections for the final quarter of the most recent year. For prior years, EPS growth has been updated to reflect actual reported results for the year, any changes in company level methodology, and other updates, as appropriate. May not sum due to rounding.

We believe these results continue to show that there is a fairly weak relationship between fundamental business performance and market performance in any one year, but that the relationship strengthens as the time horizon is extended. We are pleased with the absolute and relative performance of the businesses that we have owned in the portfolio over the last nine years, and believe that our long-term investment performance is largely a reflection of these long-term business results.

### *Business & Investment Outlook*

With few exceptions, we believe the businesses in the portfolio are performing well and are compounding capital for us at attractive rates. At year-end 2018, these businesses are trading 15.2x our estimate of 2019 EPS, which assumes about 14% EPS growth along with a 1% dividend yield.

The table below shows the beginning of year valuation and our beginning of year expectations for portfolio earnings growth, at that point in time. Our takeaway from this table is that despite significant market appreciation since the Great Recession, our estimate of the valuation and growth for the portfolio remains

largely in line with historical levels (with, we believe, higher expected growth and similar/lower valuation than the Russell 3000), giving us a favorable long-term investment outlook.

<b>Focus Equity Separate Accounts - Projection at Beginning of Year</b>			
<u>Beginning of Year</u>	<u>Business Level Price to 1yr EPS Est. <sup>*^</sup></u>	<u>Business Level 1yr Est. EPS Growth Rate<sup>*</sup></u>	<u>Business Level 5yr Est. EPS Growth Rate<sup>*</sup></u>
2010	14.9x	20%	mid-teens
2011	15.4x	16%	mid-teens
2012	14.1x	16%	mid-teens
2013	15.5x	17%	mid-teens
2014	17.9x	17%	mid-teens
2015	17.0x	17%	mid-teens
2016	16.6x	18%	mid-teens
2017	16.1x	14%	mid-teens
2018	16.4x	24%	mid-teens
2019	15.2x	14%	mid-teens

\* Based upon Broad Run internal estimates (may differ materially from consensus estimates), weighted by position size, excluding the impact of any portfolio level cash.

<sup>^</sup> Valuation based upon prior year closing price.

We did not make any changes to the portfolio during the fourth quarter, though the market decline and increased volatility does make for a more attractive investment environment as we begin the year. We continue to work on a number of investment candidates that could find their way into the portfolio in due time.

### **Updated Thinking on Select Holdings**

While our businesses did well in 2018, we had several stocks that performed poorly during the year. Below, we share some thoughts on three companies whose shares were among the largest detractors from overall performance. Two of the businesses are housing related, and one is a specialty finance company.

#### *The Housing Market, NVR, Inc. (NVR) & American Woodmark Corp. (AMWD)*

In 2018, a sharp rise in mortgage rates (from about 4.0% in January to about 5.0% in November) and rising home prices reduced housing affordability to the lowest level in the last five years. These factors reduced demand for new homes, with starts decelerating from high single digit growth at the beginning of the year to modest declines at the end of the year. In 2019, we think housing starts are likely to be between flat and down 10%. This industry reset has hammered homebuilder and building products stocks, with both groups down about 40% in 2018. We own one homebuilder, NVR, and one building products company, American Woodmark. NVR was down 31% for the year, while American Woodmark was down 57% (American Woodmark is up 21% so far in 2019, netting to a 48% decline since the beginning of 2018).

Our investment cases for both companies are primarily based upon specific opportunities they have to gain market share due to their unique business models. Secondarily, we believe the U.S. housing market has only partially recovered from the Great Recession, providing a nice industry tailwind. Housing starts have increased every year for the last 9 years, yet they were just about 1.25 million units in 2018, still about 20% below the 60-year average. In addition, because starts have been so far below normal for so long, we estimate the country has underproduced about 5 million housing units over the last 15 years, implying starts may need to exceed the long-term average for an extended period of time to get back to equilibrium.

For this reason, we believe the current housing slowdown is going to be a temporary pause in the longer trend of housing recovery. Importantly, economic growth, job growth, and household formation remain very good, Millennials are just beginning to enter their homebuying years, and affordability, while lower than it has been the last five years, is in line with the average over the last few decades. We do not believe we have a “housing affordability crisis” as some industry observers claim; we are just transitioning from a period of unusually high affordability to a more normal environment. We believe new home construction will bottom in 2019 (barring a recession that undermines jobs and confidence) through a combination of buyers acclimating (financially and psychologically) to higher mortgage rates, and sellers moderating their price expectations.

NVR is the fifth largest U.S. homebuilder, with virtually all its revenue tied to the construction of new single-family homes. In 2018, NVR grew its EPS 34%, and we expect EPS to be down modestly in 2019 through a combination of mid-to high single digit sales declines, modest margin declines (due to moderating home prices and input cost inflation), and robust share repurchases. NVR’s geographic footprint (Mid-Atlantic and Southeast) faces fewer affordability challenges than other geographies, and its no frills product design should appeal to cost-conscious buyers. Beyond 2019, we expect the company to resume EPS growth on its way back to a mid-teens rate of compounding. The stock trades at 14x the 2019 consensus EPS estimate, an attractive price for a business with its long-term potential.

If we happen to be wrong about the severity of the housing downturn, we believe NVR is well positioned. Its unique business model – optioning instead of owning land – provides great flexibility compared to other builders. NVR can renegotiate or walk away from land that it has under contract that it deems uneconomic, and the company’s free cash flow and balance sheet give it an opportunity to be aggressive with share repurchases, acquisitions, and/or land deals when circumstances warrant. In the Great Recession, NVR was the only public builder to remain profitable. It used that downturn opportunistically to gain a foothold in a variety of new geographies that seeded growth and significant value creation in the subsequent upturn.

*For further background on NVR see our second quarter 2017 client letter.*

American Woodmark is the second largest U.S. manufacturer of kitchen and bath cabinetry. It derives about 60% of its revenue from remodeling and 40% from new construction. Remodeling activity has historically been much less cyclical than new construction, and has thus far showed no signs of a slowdown. Further, the company is gaining market share in three ways: 1) it is leveraging its unique cabinet installation service platform to win new contracts with home builders, 2) its recent acquisition of RSI is providing robust cross selling opportunity, and 3) it is a new entrant into the kitchen and bath dealer channel (the largest and most lucrative distribution channel for cabinet manufacturers) with significant runway to achieve its fair share in this space.

American Woodmark’s remodeling exposure, combined with its market share gains, position it to grow even in a declining new home construction market. In 2018, American Woodmark should grow EPS 53% to \$7.23 (not yet reported) due to its RSI acquisition, and we expect EPS to grow 10% in 2019 to \$8.00. Input cost inflation, exacerbated by China tariffs, could cause some noise around our earnings forecast, but the company and industry have a long history of passing along cost increases within a few quarters. With the stock at \$67, or just 8x our 2019 EPS estimate, we believe the market is pricing in a far more severe downturn in new construction than is probable. Over the next several years, through a combination of industry growth, share gains, RSI acquisition savings, and prudent use of free cash flow, we think EPS can grow at a high teens rate. In addition, we see opportunity for the price-to-earnings multiple to expand from 8x to a more typical mid-cycle multiple of about 14x.

*For further background on American Woodmark see our first quarter 2018 client letter.*

*Encore Capital Group, Inc. (ECPG)*, is a specialty finance company that buys defaulted consumer receivables at a deep discount to face value, then undertakes recovery efforts to collect payments on those receivables. The company is multinational and is a clear leader in the U.S. and the U.K., the two largest markets for the industry.

We believe Encore is a best-in-class operator with sustainable competitive advantages that allow for better liquidation and a lower cost to collect than its peers. As a market share leader in oligopolistic markets, Encore enjoys important operational scale and cost efficiency advantages in its specialized call centers and internal/external litigation operations. When combined with investments in data and behavioral science, Encore's proprietary debtor database provides insights into the willingness and ability of debtors to pay. We believe these operational and information advantages allow Encore to take share from its peers while earning superior IRRs.

While the stock was down 44% in 2018, the business continues to perform well and we believe the near- and long-term outlook is very good. In May, Encore announced an agreement to purchase the remaining economic interest in Cabot Credit Management that it did not already own (since 2013, Encore has held a 43% economic interest in Cabot). Cabot is one of the largest credit management services providers in Europe and the market leader in the U.K. and Ireland. While initially the market reacted favorably to the announcement, shares later traded lower as the valuations of comparable European businesses declined. Competition has pressured returns in many European countries; however, we believe Cabot's unique advantages should allow it to continue to earn solid returns in its core U.K. market (the U.K. represents 86% of Cabot's estimated remaining collections). Further, as a result of the transaction, private equity firm J.C. Flowers & Co. now owns 14% of Encore's shares and this overhang is thought to be an important additional contributor to the share price weakness.

We believe the current valuation (the shares now trade near book value and about 6x consensus 2019 EPS) does not reflect the attractive economic returns being generated by the business today or its strong growth outlook; the company remains on track to generate 20% EPS growth in 2018 (not yet reported) and mid-teens growth in 2019 and thereafter. Encore will deploy more capital in the U.S. in 2018 than in any other year in its history and we believe it is earning IRRs greater than 20% on these purchases. We expect these strong returns in the U.S. to further improve in the intermediate term as the supply of paper increases with a normalization of the charge-off rate and resumption of selling by certain sidelined credit card issuers. We believe over the next five years Encore will generate mid-teens annualized EPS growth as it benefits from favorable U.S. market conditions and accretion from the Cabot transaction. Over the same time period, we see opportunity for the price-to-earnings multiple to expand from about 6x to about 10x.

#### In closing

We thank you for entrusting your capital to us. We will continue to do our best to protect and grow your investment over time.

Please let us know if there has been any change to your contact information, any change to your financial circumstances or investment objectives that might impact how we manage your account, or if you would like to add or modify any reasonable restrictions to our investment advisory services.

Sincerely,

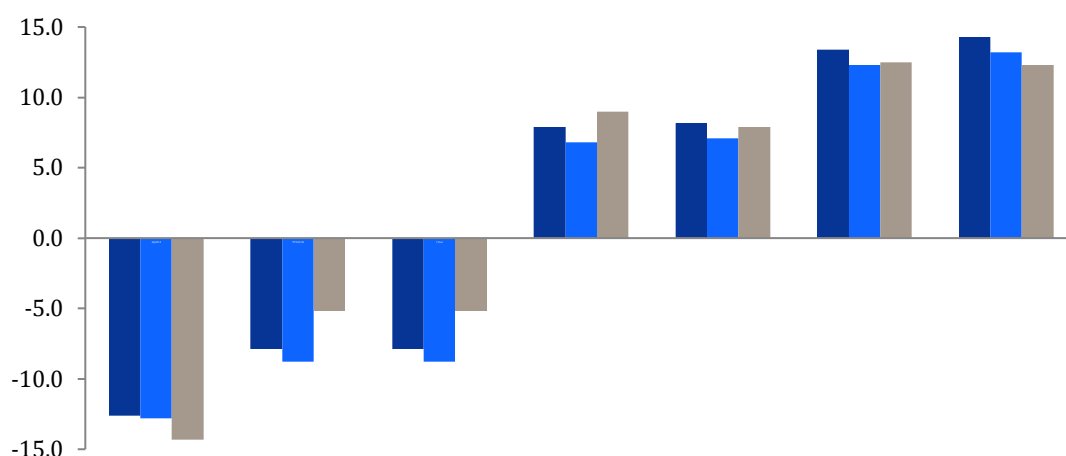
Broad Run Investment Management, LLC

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## Focus Equity Separate Accounts (FE-SA) Historical Performance and Disclosures



	4Q'18	YTD	1 YEAR	3 YEARS	5 YEARS	7 YEARS	SINCE INCEPTION (09.01.09)
FE-SA (Gross)	-12.6	-7.9	-7.9	7.9	8.2	13.4	14.3
FE-SA (Net of 1% fee)	-12.8	-8.8	-8.8	6.8	7.1	12.3	13.2
Russell 3000® Index	-14.3	-5.2	-5.2	9.0	7.9	12.5	12.3

**FE-SA Disclosures:** Broad Run presents these investment results (a subset of the Focus Equity Composite results) because it believes they are most relevant to institutional separate account investors in the Focus Equity Strategy; this information is supplemental to the GIPS® compliant presentation provided on the following page of this document. Returns presented consist of representative portfolios from the Focus Equity Composite. The representative portfolios are: (i) for the period September 1, 2009 to February 28, 2013 the sole portfolio in the composite, which is a single equity mutual fund; and (ii) for the period after February 28, 2013 (Broad Run accepted its first separate account in February of 2013) all of the separate account portfolios, which excludes any equity mutual fund(s), UCITS fund(s), and private fund(s). Broad Run believes this supplemental presentation approximates the return stream an investor in a Focus Equity separate account would have achieved for the period presented (data supporting this assertion is available upon request). Gross of fees returns are calculated gross of management and custodial fees and net of transaction costs. Net of fees returns are calculated by deducting the monthly-equivalent amount of Broad Run's highest applicable annual management fee of 1.00% ("Model Net Fee"), as described in the firm's Form ADV, Part 2A (without the benefit of breakpoints) from the monthly gross returns. Other Disclosures: Returns for time periods greater than one year are annualized. All results presented above (including the Russell 3000 Index) include the reinvestment of dividends, interest income, and capital gains. All other statistics referenced in this document for Focus Equity Separate Accounts or FE-SA were compiled using the same representative portfolios described above. **Past performance is not indicative of future results.**

## Broad Run Investment Management, LLC Focus Equity Composite Disclosure Presentation

<b>Composite Name</b>	Focus Equity Composite
<b>Reference Index</b>	Russell 3000 Index
<b>Reporting Date</b>	December 31, 2018
<b>Composite Inception</b>	September 1, 2009

**GIPS Compliance and Verification Status.** Broad Run Investment Management, LLC (Broad Run) claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Broad Run has been independently verified for the periods October 27, 2012 through December 31, 2017. The verification report is available upon request. 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. Verification does not ensure the accuracy of any specific composite presentation.

Policies for valuing portfolios, calculating performance and preparing compliant presentations are available upon request. A list of composite descriptions is available upon request.

**Firm Information.** Broad Run is an investment advisor registered with the U.S. Securities and Exchange Commission under the Investment Advisers Act of 1940, as amended. Broad Run is defined as an independent investment advisor that is not affiliated with any parent organization.

**Composite Description.** The Focus Equity Composite contains all fee-paying, discretionary accounts that are managed according to Broad Run's Focus Equity Strategy. The Focus Equity Strategy invests primarily in U.S. equity securities—regardless of capitalization—and seeks long-term capital appreciation while incurring a low risk of permanent capital loss. The Strategy uses a concentrated and low turnover investment approach, and generally seeks to invest in what the firm believes are high-quality growth-oriented companies trading at discounts to Broad Run's assessment of their intrinsic value. Broad Run has determined that no appropriate benchmark for the composite exists because the Focus Equity Strategy has minimal exposure to a number of sectors and invests across the market capitalization spectrum. The Focus Equity Composite was created in October 2012; its inception date is September 1, 2009. From September 1, 2009 to October 26, 2012, the composite is composed solely of an equity mutual fund. Broad Run's managing members served as portfolio managers for this equity mutual fund while employed at the fund's advisor. From October 27, 2012 to February 28, 2013, the composite is composed solely of the successor equity mutual fund to the aforementioned equity mutual fund. Broad Run is engaged as the sole sub-advisor of the successor equity mutual fund (managing 100% of its assets) by its new advisor, and the firm's managing members serve as portfolio managers for the successor equity mutual fund. Broad Run has met the GIPS portability requirements to link the returns of the equity mutual fund and the successor equity mutual fund. For the time period after February 28, 2013, the composite is composed of the successor equity mutual fund and separate accounts. Currently, the assets in the mutual fund comprise a significant majority of the composite's assets.

**Fee Schedule.** Broad Run's standard annual asset-based management fee schedule is 1% of the account's total assets on the first \$5 million and 0.85% thereafter. Gross performance results do not reflect the deduction of Broad Run's investment advisory fee, which will affect a client's total return. Gross of fees returns are calculated gross of management and custodial fees and net of transaction costs. Net of fees returns are calculated by deducting the monthly-equivalent amount of Broad Run's highest applicable annual management fee of 1.00% ("Model Net Fee"), as described in the firm's Form ADV, Part 2A (without the benefit of breakpoints) from the monthly composite gross return.

**Reference Index Disclosure.** The Russell 3000 Index measures the performance of the largest 3000 U.S. companies representing approximately 98% of the investable U.S. equity market. The index is market-value weighted. Index figures reflect the reinvestment of dividends and capital gains. Index figures do not reflect deductions for any fees, expenses, or taxes. Investors cannot invest directly in an index. The index's performance returns are included to illustrate the general trend of the U.S. equity market and are not intended as a benchmark for the composite.

**Other.** All returns presented in the table below (including the reference index) include the reinvestment of dividends, interest income, and capital gains. Valuations are computed and performance is reported in U.S. dollars.

	Calendar										Annualized (12/31/18)				
	2018	2017	2016	2015	2014	2013	2012	2011	2010	Sep-Dec 2009 <sup>1</sup>	1 YR	3 YR	5 YR	7 YR	Since Inception
<b>Focus Equity Composite Gross Return (%)</b>	-9.09	21.43	8.83	4.40	11.76	37.18	18.27	5.13	26.40	8.64	-9.09	6.31	6.99	12.45	13.57
<b>Focus Equity Composite Net Return (%)</b>	-10.01	20.24	7.76	3.37	10.66	35.85	17.11	4.08	25.16	8.29	-10.01	5.25	5.93	11.35	12.45
<b>Russell 3000 Return (%)</b>	-5.24	21.13	12.74	0.48	12.56	33.55	16.24	1.03	16.93	10.34	-5.24	8.97	7.91	12.46	12.34
<b>Composite Standard Deviation<sup>2</sup></b>	11.25	10.31	12.06	11.30	9.44	12.52	16.80	- <sup>3</sup>	- <sup>3</sup>	- <sup>3</sup>	n.m. <sup>4</sup>	11.25	11.76	11.00	13.42
<b>Russell 3000 Standard Deviation<sup>2</sup></b>	11.18	10.09	10.88	10.58	9.30	12.54	15.74	- <sup>3</sup>	- <sup>3</sup>	- <sup>3</sup>	n.m. <sup>4</sup>	11.18	11.07	10.83	12.70
<b>Number of Portfolios</b>	155	137	101	52	41	30	1	1	1	1					
<b>Internal Dispersion<sup>5</sup></b>	0.64	0.96	0.31	0.13	0.10	n.m.	n.m.	n.m.	n.m.	n.m.					
<b>Composite Assets (USD millions)</b>	2,326.8	3,309.6	2,671.8	2,266.5	1,618.5	1,454.0	781.2	672.2	772.8	812.5					
<b>Firm Assets (USD millions)</b>	2,330.3	3,311.2	2,794.1	2,268.6	1,619.5	1,459.8	781.2	N/A	N/A	N/A					

**Past performance is not indicative of future results.**

**1:** Annual Performance Results reflect partial period performance. The returns are calculated from September 1, 2009 to December 31, 2009 for the Focus Equity Composite. **2:** Standard deviation measures the variability of the gross returns of the composite and the reference index. All standard deviation figures are calculated using monthly gross performance numbers. Figures presented for calendar year and YTD periods are three-year annualized standard deviations. **3:** The three-year annualized standard deviation is not shown due to having less than 36 months of composite returns. **4:** n.m. - Not statistically meaningful for periods less than 3 years. **5:** The annual composite dispersion presented is a dollar-weighted standard deviation of the gross returns for all accounts in the composite for the entire year, using beginning of period values; not statistically meaningful (n.m.) for periods less than one year, or when there are five or fewer accounts in the composite for the entire year.



## *Other Disclosures*

**Additional Composite Details.** The Focus Equity Composite includes a mutual fund for which we charge a sub-advisory fee that is lower than the model net fee. However, the mutual fund's total operating expenses, which are not applicable to you, are in excess of the model net fee. Therefore, the actual performance of the mutual fund in the composite on a net-fee basis will be different, and will normally be lower, than the model net fee performance. However, the model net fee performance is intended to provide the most appropriate example of the impact management fees would have by applying management fees relevant to you to the gross performance of the composite. Actual fees and expenses in client accounts may differ from those reflected in this composite presentation and would cause actual performance to differ. The performance figures do not reflect the deduction of any taxes an investor might pay on distributions or redemptions.

**Investing Involves Risk.** Investing involves risk, including the possible loss of principal. Past performance is no guarantee of future results and client accounts may not achieve the Focus Equity Strategy's investment objective. There may be market, economic, or other conditions that affect client account performance, or the performance of the referenced market index. Therefore, it should not be assumed that the future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended and/or undertaken by Broad Run Investment Management, LLC) made reference to directly or indirectly in this commentary will be profitable, equal any corresponding indicated historical performance level(s), be suitable for your portfolio or individual situation, or prove successful. The Strategy invests in small- and medium-size companies. Investments in these companies, especially smaller companies, carry greater risk than is customarily associated with larger companies for various reasons such as increased volatility of earnings and business prospects, narrower markets, limited financial resources and less liquid stock. A client account invested in the Focus Equity Strategy will hold fewer securities and have less diversification across industries and sectors than a diversified portfolio, such as a portfolio based on an index. Consequently a client account and/or the composite performance may diverge significantly from the referenced market index, positively or negatively.

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