

QDIA OPINION LETTER

May 8, 2015

3D Asset Management, Inc.
111 Founders Plaza, Suite 1707
East Hartford, CT 06108

Dear 3D Asset Management, Inc.:

We have evaluated the 3D/Newfound PrudentPath Portfolios (Investment) offered by 3D Asset Management, Inc. (Manager) to determine if they comply with the requirements to be used as a qualified default investment alternative ("QDIA") as defined by the Employee Retirement Income Security Act of 1974, as amended ("ERISA") Section 404(c)(5).

Based on evaluations concluded on May 8, 2015 it is our opinion that ERISA plan fiduciaries who meet all other ERISA requirements and use the Investment(s) listed below will qualify for the fiduciary relief granted by QDIA. 3D Asset Management, Inc. is hereby granted the right to use the DALBAR QDIA Validation Seal on its materials and to advertise the fact that the following investments have been validated by DALBAR until December 31, 2016:

- 3D/Newfound PrudentPath Portfolios

Detailed findings from our evaluations are available from DALBAR and may be obtained from the website www.DALBAR.COM.

Our opinion regarding the investment listed above and the rights granted to 3D Asset Management, Inc. by this letter are based on information provided by 3D Asset Management, Inc. and confirmed through public sources where possible. Any material change or discrepancy in this information could reverse our opinion and revoke the rights granted herein.

The scope of our evaluations consists of those aspects of the requirements of ERISA Section 404(c)(5) that can reasonably be met by practices, procedures and obligations of investment managers. These include the applicability of the Investment to one or more types of QDIA, qualification of the manager and the Investment under QDIA requirements as well as the reasonableness of the Investment with respect to fees, performance and use of generally accepted investment theory.

It should be noted that our evaluations are intended to facilitate plan fiduciary compliance and do not replace the requirements for ERISA plan fiduciaries to prudently select and monitor plan investments, including QDIAs.

Very truly yours,

Dalbar, Inc.

