Independent Verifier’s Report on GIPS® Compliance

Cabana Asset Management:

We have examined whether Cabana Asset Management (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, 2012 through December 31, 2018, and (2) designed its policies and procedures to calculate and present performance results in compliance with the GIPS standards as of December 31, 2018.

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, 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 presentations, and performing the procedures for a verification 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, Cabana Asset Management, 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, 2012 through December 31, 2018; and
- Designed its policies and procedures to calculate and present performance results in compliance with the GIPS standards as of December 31, 2018.

This report does not relate or provide assurance on any specific compliant presentation.

Michael W. Hultzapple, CPA, CFA, CIPM
April 29, 2019