Pacific Income Advisers, Inc.

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This brochure provides information about the qualification and business practices of Pacific Income Advisers, Inc. ("PIA"). If you have any questions about the contents of this brochure, please contact us at (310) 393-1424, or by email at info@pacificincome.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

Additional information about Pacific Income Advisers, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

March 26, 2020

Material Changes

Annual Update

Pacific Income Advisers, Inc. ("PIA") is providing this information as part of our annual update, which contains material changes from our last annual update. This section discusses only material changes since the last update, which most recently occurred on March 29, 2019.

Material Changes Since the Last Update

There have been no material changes since the last update on March 29, 2019.

Full Brochure Availability

If you would like to receive a free copy of PIA's Firm Brochure, please call (888) 742-7869, visit our website, www.pacificincome.com, email us at info@pacificincome.com or write us at PIA-ADV Request, 1299 Ocean Avenue, Second Floor, Santa Monica, CA 90401. You may also view a copy of PIA's Firm Brochure through the Investment Adviser Public Disclosure (IAPD) system at www.adviserinfo.sec.gov.

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Advisory Business

Firm Description

Pacific Income Advisers, Inc. ("PIA"), a Delaware Corporation, is federally registered as an investment adviser with the Securities and Exchange Commission ("SEC") and has been in business since 1986.

PIA is an independent, employee-owned investment advisory firm, with approximately $7,070,000,000 in assets under management, in fixed income and equities. For more information on the types of clients we serve, please see the *Types of Clients* section of this brochure.

PIA's headquarters and principal place of business is located at 1299 Ocean Avenue, 2nd Floor, Santa Monica, California 90401. Additionally, PIA has regional external sales offices located in Colorado and North Carolina.

Principal Owners

Lloyd McAdams, President and Portfolio Manager, through the Lloyd McAdams Family Trust, and Heather U. Baines, Chairman, through the Heather U. Baines Family Trust, are the principal owners of PIA. Timothy Tarpening and Joseph E. McAdams individually own minority interests in PIA.

Types of Advisory Services

PIA offers investment grade, high yield, municipals and convertible fixed income strategies, as well as equities to those clients described in the *Types of Clients* section, through three distinct platforms consisting of institutional separately managed accounts (Institutional SMA), retail separately managed wrap-fee program accounts (Retail Wrap-Fee Programs) and mutual funds.

<u>Institutional SMA</u>
PIA invests in the following portfolio styles for its Institutional SMA clientele:

<u>Equities</u>
- Small Cap – Core;
- Small Cap – Value;
- Small Cap – Growth;

<u>Fixed Income</u>
- Convertibles;
- Core Plus;
- Corporate;
- Customized Cash Management;
- High Yield;
- Intermediate Core Plus;
- Liability Driven Instruments ("LDI");

- Limited Duration;
- Market Duration;
- Moderate Duration;
- Municipal Fixed Income;
- Short-Term;
- Short-Term Government;
- Ultra Short-Term;
- Shares in the PIA BBB Bond Fund, Managed Account Completion Shares ("MACS"), PIA High Yield (MACS) Fund and/or the PIA MBS Bond Fund, MACS;
- Shares in the PIA Short-Term Securities Fund and/or the PIA High Yield Fund, Institutional Class (see "PIA Mutual Funds" below).

Retail Wrap-Fee Programs

PIA currently participates in approximately 31 Retail Wrap-Fee Programs as a sub-adviser or under a dual contract arrangement. PIA does not sponsor any wrap-fee program.

PIA offers the following managed account portfolio styles:

- Core Plus;
- Corporate MACS;
- Intermediate Core Plus;
- Limited Duration ETF-MACS;
- Limited Duration MACS;
- Limited Duration SMA;
- Limited Duration SMA Enhanced;
- Market Duration ETF-MACS;
- Market Duration MACS;
- Market Duration SMA;
- Market Duration SMA Enhanced;
- Moderate Duration MACS;
- Moderate Duration ETF-MACS;
- Small Cap Core;
- Shares in the PIA BBB Bond Fund, MACS, PIA High Yield (MACS) Fund and/or the PIA MBS Bond Fund, MACS; and
- Shares in the PIA Short-Term Securities Fund and/or the PIA High Yield Fund, Institutional Class (see "PIA Mutual Funds" below).

PIA Mutual Funds

PIA serves as sub-adviser to the PIA Mutual Funds, a family of open-end registered mutual funds. PIA offers five funds:

- PIA BBB Bond Fund, MACS;
- PIA High Yield Fund, Institutional Class;
- PIA High Yield (MACS) Fund;
- PIA MBS Bond Fund, MACS; and
- PIA Short-Term Securities Fund.

Pooled Investment Vehicles (Other than Investment Company)

- Anworth Mortgage Asset Corporation

For more information on each of these investment strategies, please see the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure. Anworth Management, LLC is a relying adviser of PIA, and is the external manager for Anworth Mortgage Asset Corporation (Ticker "ANH"), an NYSE-listed mortgage Real Estate Investment Trust ("REIT") and Pooled Investment Vehicle (Other than Investment Company), with December 31, 2019 total assets of approximately $4.90 billion. Anworth Management, LLC performs such services and activities relating to ANH's assets and operations as may be appropriate.

PIA also provides administrative services (which exclude investment advisory services) to Anworth Mortgage Asset Corporation. Please see the *Other Financial Industry Activities and Affiliations* section of this brochure for more information.

Tailored Relationships

Although most client relationships are discretionary and accounts are managed in accordance with the methods and investment strategies as explained in the *Methods of Analysis, Investment Strategies and Risk of Loss* section of this brochure, clients may still impose investment limitations and restrictions on certain securities or types of securities. Such restrictions must be submitted to PIA in writing, if not already addressed in the investment management agreement.

Investment Management Agreement

Institutional SMA

All clients desiring to open an Institutional Separately Managed Account with PIA must enter into PIA's investment management agreement and provide an investment policy statement. PIA relies upon the contents of the client's completed investment policy statement when evaluating the most suitable types of investment products for the client.

Retail Wrap-Fee Programs

Under Retail Wrap-Fee Programs, advisory clients pay a specified fee for investment advisory services and the execution of transactions. Advisory services may include portfolio management and/or advice concerning selection of other advisers; and the fee is not based directly upon transactions in the client's account. PIA receives a portion of the wrap fee for services rendered.

Retail Wrap-Fee Programs are managed similarly to Institutional SMAs with the following exceptions:

- Corporate bond position sizes are normally 3% per issuer for Retail Wrap-Fee Programs and 0.5-1.5% for Institutional SMA.
- The bonds in the Retail Wrap-Fee Program are typically more liquid.

Although the ultimate responsibility of analyzing suitability of investments rests solely with the program sponsor, PIA requests from the program sponsor detailed client information, including client profiles, account restrictions and other material documents in order to review the investment portfolio(s), guidelines and restrictions (where applicable) selected by the client prior to investment.

Mutual Funds

Some clients who wish to invest in any of PIA's mutual funds may, in addition to completing a new account form, enter into a PIA Investment Management Agreement and submit an investment policy statement.

Assets Under Management

As of December 31, 2019, PIA managed $7,070,000,000 on a discretionary basis and $17,000,000 on a non-discretionary basis.

Fees and Compensation

Description and Billing

When calculating the value of client investments for reporting or fee calculation purposes, PIA utilizes to the fullest extent possible, recognized and independent pricing services. Whenever valuation information for specific, illiquid, foreign, private or other investments is not available through pricing services, PIA's Portfolio Manager(s) will obtain and document price information from at least two independent sources, such as broker-dealers, banks, pricing services or other sources, where practicable and appropriate. The client has the ability to determine the method for computing fair market value used in the fee calculation. Most commonly, management fees are calculated by applying the advisory fee to the market value of the account at the end of each quarter. When calculating the value of client investments for reporting or fee calculation purposes, by default, PIA includes accrued interest on fixed income securities under management. Another common practice is to use the average of three month-end values on a quarterly basis. In rare situations, PIA takes significant cash flows into account when computing the average. The method utilized will be noted within the client's investment management agreement.

Institutional SMA

For all Separately Managed Accounts, PIA charges an annual advisory fee that is calculated and paid quarterly in accordance with the following fee tables:

Annual Fee Based on Total Value of Client Assets under Management with PIA*

Portfolio Style	**1st $50MM**	**Next $50MM**	**Thereafter**
High Yield	.50%	.45%	.40%

Portfolio Style	**1st $25MM**	**Next $25MM**	**Thereafter**
Core Plus	.35%	.30%	.25%
Intermediate Core Plus	.35%	.30%	.25%

Portfolio Style	**1st $10MM**	**Next $40MM**	**Thereafter**
Corporate	.40%	.30%	.25%
Liability Driven Instruments	.35%	.30%	.25%
Limited Duration	.35%	.30%	.25%
Market Duration	.35%	.30%	.25%
Moderate Duration	.35%	.30%	.25%
Municipal Fixed Income	.35%	.30%	.25%

Portfolio Style	**1st $10MM**	**Next $15MM**	**Thereafter**
Customized Cash Management	.25%	.20%	.15%

Portfolio Style	**1st $10MM**	**Next $40MM**	**Next $50MM**	**Thereafter**
Short-Term	.25%	.20%	.175%	.15%
Short-Term Government	.25%	.20%	.175%	.15%

Ultra Short-Term	.25%	.20%	.175%	.15%

Portfolio Style	**1st $1MM**	**Thereafter**
Convertibles	.625%	.50%

Portfolio Style	**1st $10MM**	**Next $40MM**	**Thereafter**
Small Cap	1.0%	.80%	.70%

*Fees are negotiable.

Retail Wrap-Fee Programs

PIA's fee for its wrap-fee arrangements is determined by separate contracts entered into with various program sponsors. These fees, including any and all trading and transaction costs are "wrapped" into one overall fee as determined and calculated by the wrap-fee sponsor. Annual wrap-fees for PIA clients, charged by the program sponsor, generally vary between 1.00% and 3.00% of the assets under management.

The amount of PIA's portion of the wrap fee varies dependent upon several factors, including: (1) the specific terms agreed on between PIA and the wrap-fee sponsor, (2) the client's account size, (3) the client's related investment management accounts, (4) individual account investment restrictions, (5) and whether any assets are invested in one of PIA's Mutual Funds. If PIA invests a portion of the wrap-fee client's assets in one of PIA's non-MACS Mutual Funds, PIA may waive any additional fees or expenses to avoid duplication of management fees.

Important information about the program sponsor's advisory programs, brokerage services, custody relationships, and conflicts of interest is available in the Program Sponsor's Form ADV Part 2. To obtain a copy, please contact the Program Sponsor directly.

Mutual Funds

PIA charges management fees for acting as investment manager for PIA's Mutual Funds. Such fees are calculated depending on the portfolio style, and paid monthly in arrears.

- PIA Short-Term Securities Fund — 0.20% of assets under management
- PIA High Yield Fund, Institutional Class — 0.55% of assets under management
- PIA BBB Bond Fund, MACS — Fee charged through Program Sponsor *
- PIA High Yield (MACS) Fund — Fee charged through Program Sponsor *
- PIA MBS Bond Fund, MACS — Fee charged through Program Sponsor *

* PIA clients and the clients of PIA's Plan Sponsors may permit their account(s) to invest in the BBB Bond Fund, the MBS Bond Fund, and the PIA High Yield (MACS) Fund. Therefore, in order to avoid charging clients two advisory fees on managed assets which may be invested in these funds, the MACS mutual funds do not directly charge any management fees directly inside these funds.

PIA may recommend investment in the PIA Funds to any of its clients. Such a recommendation could create a conflict of interest between PIA and the client. PIA will only recommend an investment in Fund shares for client portfolios if it represents a suitable investment based on that client's investment objectives.

PIA receives an account-level investment management fee from its clients (as stated in clients' investment management agreement), calculated as a percentage of client assets, which includes assets invested in the Funds. PIA also receives management fees paid by a Fund (as disclosed in the Fund's prospectus) based on client assets invested in that Fund. Certain clients (including ERISA plans) invested in the Funds will pay fees associated with the Funds' operations, but will not pay additional investment management fees to PIA on those assets invested in the Fund. In addition, for clients invested in the Funds, PIA may choose to offset certain client fees, including but not limited to account-level fees, by the amount of the management fees received from the Funds.

Pooled Investment Vehicle (Other than Investment Company)

Anworth Management, LLC receives a management fee paid monthly in arrears in an amount equal to one-twelfth of 1.20% of ANH Equity, as defined in the Management Agreement.

Fee Billing

Investment advisory fees are generally billed quarterly in arrears unless PIA and the client agree that they will be billed in advance. Clients are either invoiced directly, or the client's custodian automatically deducts fees from the client's account at the end of each calendar quarter, in accordance with the written direction and approval of clients. For accounts opened or closed after the beginning of a new calendar quarter, fees will be prorated for the number of days in the quarter the account was under management. Any earned, unpaid fees will be due and payable at the time the account is closed. PIA reserves the right to pro-rate the quarterly fee based on intra-period contributions and withdrawals. In cases where PIA has agreed to bill its advisory fees quarterly in advance and either party terminates the provision of investment advisory services before the end of a calendar quarter, fees will be reimbursed to the client on a pro-rata basis for the number of days in the quarter the account was not under management. PIA will return any unearned fees to the client.

Institutional SMA

Clients are either invoiced directly, or the client's custodian automatically deducts fees from the client's account at the end of each calendar quarter, in accordance with the written direction and approval of clients.

Retail Wrap-Fee Programs

The program sponsor automatically deducts fees from the client's account at the end of each calendar quarter, in accordance with the written direction and approval of clients.

Wrap-fee clients are required to pay the program sponsor a quarterly advisory fee based on the sponsor's advisory fee and PIA's negotiated management fee.

Other Fees

In connection with PIA's advisory services, clients may incur and are responsible for the fees and expenses charged by their custodians and imposed by broker-dealers. Such fees may include, but are not limited to, custodial fees, transaction costs, fees for duplicate statements and transaction

confirmations, brokerage commissions, mutual fund expenses and fees for electronic data feeds and reports. See the *Brokerage Practices* section for more information.

Institutional SMA advisory fees are negotiable. For friends and family of PIA, such advisory fees will be waived or reduced.

PIA and its supervised persons do not receive compensation for the sale of securities or other investment products, including asset-based sales charges, or distribution or service fees from the sale of mutual funds.

Performance-Based Fees

If PIA engages in alternative fee arrangements, such as those based on performance (including unrealized gains), PIA calculates the fee in accordance with the requirements of the Investment Advisers Act of 1940. Such performance fee arrangements are only made with "Qualified Clients" as defined under Rule 205-3, who reside in jurisdictions where performance fees are permitted. Performance fee arrangements create an inherent conflict of interest, as they may create incentives for PIA to make investments that are riskier or more speculative than the firm would otherwise make in the absence of a performance fee. In order to address any potential conflicts of interest, no Portfolio Manager's compensation is tied to any client's performance-based fees.

Types of Clients

Description

PIA currently provides advisory services to individuals, trusts, estates, investment companies, pooled investment vehicles, pension and profit sharing plans, charitable organizations, state or municipal government entities, insurance companies, corporations and business entities, strike accounts and hospital funds.

Account Minimums

PIA recommends accounts opening at no less than $1 Million. Furthermore, those clients who wish to open separately managed fixed income portfolio accounts should be aware that frequent requests to liquidate all, or a portion, of their accounts to a size of $10 Million or less will most likely result in "odd lot" bond transactions. Odd lot bond transactions can usually only be executed at levels that are significantly less favorable than "round lot" bond transactions ($1+ million par value). Therefore, potential clients are discouraged from entering into any separate account investment advisory arrangement with PIA if there is any material likelihood of frequent significant bond portfolio liquidations.

For wrap-fee accounts, generally PIA and the program sponsor recommend accounts opening at not less than $70 Thousand. However, no minimum annual fee is assessed.

Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

The foundation of PIA's investment process is the firm's Yield Curve and Sector Analysis. PIA's yield curve analysis is centered on a fundamental belief that there is an equilibrium shape for the various yield curves, which is a function of several factors, including economic cycles, financial market volatility, and the supply factors across each part of the yield curve. Market forces tend to distort these yield curves away from their equilibrium shape. Each yield curve sector is evaluated based on its relationship to that equilibrium shape, and to the risks embedded in each yield curve. PIA ranks sectors in terms of their valuations on a risk-adjusted basis. PIA also utilizes other quantitative resources designed to gain probabilistic insight into factors affecting sector valuations. PIA utilizes internal quantitative MBS research and qualitative credit research that produces top-down and bottom-up security analysis. The Investment Strategy Group utilizes these inputs as part of their decision making process. The Investment Strategy Group is responsible for all macro investment decisions for PIA's fixed income strategies; i.e. sector selection, duration, curve positioning and average credit quality. The Investment Strategy Group is comprised of six senior employees of the firm, including the Head of the Bond Department.

Investment Strategies

PIA offers several taxable, domestic investment grade strategies. The firm also offers core plus fixed income, high yield, convertible, municipal and equity strategies.

PIA provides these investment alternatives to both institutional and retail investors via separate accounts and mutual funds. PIA manages the SMA strategies through the means of a composite, which is defined as aggregation of individual portfolios representing a similar investment mandate, objective or strategy.

Duration is a measure of a debt security's price sensitivity to interest rate fluctuations. Higher duration indicates bonds that are more sensitive to interest rate changes.

Equities

Small Cap – Core

The Small Cap Core Composite consists of discretionary institutional portfolios that are benchmarked to the Russell 2000 Index. There is no account minimum.

Small Cap – Growth

The Small Cap Growth Strategy consists of discretionary institutional portfolios that are benchmarked to the Russell 2000 Growth Index. There is no account minimum.

Small Cap – Value
The Small Cap Value Strategy consists of discretionary institutional portfolios that are benchmarked to the Russell 2000 Value Index. There is no account minimum.

Fixed Income

Convertibles Equity Income
This composite consists of portfolios which are benchmarked to the (ICE) BofAML U.S. All Convertibles Index. Portfolios managed in this style tend to invest in convertibles, equities and fixed income securities. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for this composite is $500 Thousand.

Investment Grade Convertibles
This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. Convertibles: Investment Grade Index and is constructed from convertibles which pay periodic interest. Portfolios managed in this style tend to invest in convertibles, equities and fixed income securities. A maximum of 25% of the composite may be invested in below investment grade securities. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for this composite is $500 Thousand.

Core Plus
This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. Aggregate Bond Index and is constructed from all major fixed income sectors. Portfolios managed in this style seek to maximize total return and allow the use of non-investment grade securities as well as other non-benchmark sectors. The composite will tactically invest in sectors outside the index (typically ranging from 10% - 40%) and hold more concentrated positions to enhance returns and diversify holdings. There is no minimum account size.

Corporate
This strategy consists of portfolios invested in all aspects of the corporate sector. It is benchmarked to the Bloomberg Barclays U.S. Corporate Bond Index. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. There is no minimum account size.

Corporate MACS
This composite consists of wrap portfolios invested in all aspects of the corporate sector, and also utilizes the PIA BBB Bond Fund. It is benchmarked to the Bloomberg Barclays U.S. Corporate Bond Index. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for this composite is $70 Thousand.

Customized Cash Management
PIA offers a spectrum of customized cash management solutions that attempt to match each client's unique liability structure while maximizing the asset yield for short-term investment pools. PIA offers these customized services to institutions and individuals to assist in evaluating the status of the investor's liability funding, along with expectations about future liability status under various market environments and volatilities. The minimum account size is $2 Million.

High Yield
The High Yield Composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. High Yield Index. The Composite invests in high yield bonds, both public and private, as well as equity and equity-linked securities obtained in exchange offers or insolvency proceedings. There is no account minimum.

Intermediate Core Plus
This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index, and is constructed from all major sectors. Portfolios managed in this style seek to maximize total return and allow the use of non-investment grade securities as well as other non-benchmark sectors. The composite will tactically invest in sectors outside the Index (typically ranging from 10% - 40%) and hold more concentrated positions to enhance returns and diversify holdings. There is no account minimum.

Liability Driven Investments ("LDI")
PIA offers a spectrum of customized LDI strategies that attempt to match each client's unique liability structure, while maximizing the asset yield for fully funded liabilities or maximizing the likelihood of fully funding an underfunded or uncertain liability. PIA offers these customized services to institutions and individuals to assist in evaluating the status of the investor's liability funding, along with expectations about future liability status under various market environments and volatilities. The minimum account size is $5 Million.

Limited Duration
This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $1 Million.

Limited Duration ETF-MACS
This composite consists of wrap portfolios that invest in the PIA Completion Funds and Sector ETFs. The strategy is benchmarked to the Bloomberg Barclays U.S. Intermediate Government/Credit Index and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The strategy may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark.

Limited Duration MACS
This composite consists of wrap portfolios that invest in completion funds (PIA BBB Bond Fund and PIA MBS Bond Fund), is benchmarked to the Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index benchmark, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $75 Thousand.

Limited Duration SMA
This composite consists of wrap portfolios that do not invest in completion funds (PIA BBB Bond Fund and PIA MBS Bond Fund). It is benchmarked to the Bloomberg Barclays U.S. Intermediate Government/Credit Bond Index benchmark, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $70 Thousand.

Limited Duration SMA Enhanced
This composite consists of wrap portfolios that invest in the PIA BBB Bond Fund. It is benchmarked to the Bloomberg Barclays U.S. Intermediate Government/Credit Index, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $70 Thousand.

Market Duration
This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. Government/Credit Bond Index, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $1 Million.

Market Duration ETF-MACS
This strategy consists of wrap portfolios that invest in the PIA Completion Funds and Sector ETFs, is benchmarked to the Bloomberg Barclays U.S. Government/Credit Index and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The strategy may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark.

Market Duration MACS
This composite consists of wrap portfolios that invest in completion funds (PIA BBB Bond Fund and PIA MBS Bond Fund). It is benchmarked to the Bloomberg Barclays U.S. Government/Credit Bond Index benchmark, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges as compared to those of the

Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $75 Thousand.

Market Duration SMA

This composite consists of wrap portfolios that do not invest in completion funds (PIA BBB Bond Fund and PIA MBS Bond Fund). It is benchmarked to the Bloomberg Barclays U.S. Government/Credit Bond Index benchmark, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $70 Thousand.

Market Duration SMA Enhanced

This composite consists of wrap portfolios that invest in the PIA BBB Bond Fund. It is benchmarked to the Bloomberg Barclays U.S. Government/Credit Index, and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $70 Thousand.

Moderate Duration

This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. Aggregate Bond Index, and is constructed from all major fixed income sectors. Portfolios managed in this style tend to be conservative in terms of sector weights, quality and duration ranges, compared to that of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $1 Million.

Moderate Duration ETF-MACS

This strategy consists of wrap portfolios that invest in the PIA Completion Funds and Sector ETFs, is benchmarked to the Bloomberg Barclays U.S. Aggregate Bond Index and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The strategy may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark.

Moderate Duration MACS

This composite consists of wrap portfolios that invest in completion funds (PIA BBB Bond Fund and PIA MBS Bond Fund). It is benchmarked to the Bloomberg Barclays U.S. Aggregate Bond Index and is constructed from all major fixed income sectors. Portfolios managed in this style will tend to deviate in terms of sector weights, quality and duration ranges, as compared to those of the Index. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $75 Thousand.

Municipal Fixed Income

The Municipal Composite consists of portfolios benchmarked to the (ICE) BofAML 1-5 Year AAA-AA Municipal Bond Index. The Composite primarily invests in municipal bonds and may invest in sectors

that are not included in the Index and may not necessarily be representative of its benchmark. There is no minimum account size.

Short-Term

This composite consists of portfolios benchmarked to the Bloomberg Barclays U.S. 1-3 Year Government Bond Index, and is constructed from all major fixed income sectors. Portfolios managed in this style emphasize capital preservation. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $1 Million.

Short-Term Government

This composite consists of institutional portfolios which are benchmarked to the Bloomberg Barclays U.S. 1-3 Year Government Index, and is constructed primarily from U.S. Treasury and Agency sectors. Portfolios managed in this style emphasize capital preservation. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $1 Million.

Ultra Short

This composite consists of portfolios benchmarked to the ICE BofAML 1-Year U.S. Treasury Note Index, and is constructed from all major fixed income sectors. Portfolios managed in this style emphasize capital preservation. The composite may invest in sectors that are not included in the Index and may not necessarily be representative of its benchmark. The minimum account size for the composite is $1 Million.

PIA Funds

PIA BBB Bond Fund

Under normal market conditions, the BBB Bond Fund invests at least 80% of its net assets (plus any borrowings for investment purposes) in bonds rated BBB by one or more of the three credit rating agencies and/or an equivalent Nationally Recognized Statistical Rating Organization ("NRSRO"). The BBB Bond Fund may invest up to 50% of its total assets in securities of foreign issuers denominated in U.S. dollars, including issuers located in emerging markets.

The weighted average duration of the BBB Bond Fund will generally range from six to ten years. Duration is a measure of a debt security's price sensitivity to interest rate fluctuations. Higher duration indicates bonds that are more sensitive to interest rate changes. Bonds with shorter duration reduce the risk associated with interest rates. Duration takes into account a debt security's cash flows over time, including the assumptions about the timing of how a debt security might be prepaid by the issuer or redeemed by the holder prior to its stated maturity date. In contrast, maturity measures only the time until final payment is due.

In selecting investments for the BBB Bond Fund, the Adviser will primarily consider credit quality, duration and yield.

In its effort to provide a total rate of return that approximates that of bonds rated within the BBB category by the three rating agencies, the BBB Bond Fund may invest up to 20% of its net assets in

futures, options and other derivatives. The Fund may sometimes use derivatives as a substitute for taking a position in bonds rated BBB or Baa and/or as part of a strategy designed to reduce exposure to other risks, such as interest rate risk.

PIA High Yield (MACS) Fund

The High Yield (MACS) Fund invests, under normal circumstances, at least 80% of its net assets (plus any borrowings for investment purposes) in a diversified portfolio of domestic and foreign high yield instruments ("junk bonds"), defined as bonds, convertible securities, forward commitments, loan participations and assignments, preferred stocks and Rule 144A securities. High yield instruments are securities rated below investment grade by the three rating agencies, or, if unrated, determined by the Adviser to be of comparable quality.

The remainder of the High Yield (MACS) Fund's assets may be invested in investment grade instruments including bonds, debt securities, convertible securities and other similar instruments issued by various U.S. and non-U.S. public- or private-sector entities, and loan participations and assignments.

The average portfolio duration of the High Yield (MACS) Fund normally varies within two years (plus or minus) of the duration of the Bloomberg Barclays U.S. Corporate High-Yield Index (the "Barclays Index") at any point in time. The Barclays Index had a duration of 3.07 years as of January 31, 2020. Duration is a measure of the expected life of a fixed income security that is used to determine the sensitivity of a security's price to changes in interest rates.

The Fund may invest up to 10% of its net assets in securities and instruments that are economically tied to emerging market countries.

The High Yield (MACS) Fund may invest up to 5% of its net assets in derivative instruments, such as options, futures contracts or swap agreements for both bona fide hedging purposes and for speculative purposes. From time to time, the Fund may experience significant inflows; if this occurs, the Fund may, on a temporary or interim basis, invest these new assets (potentially in an amount which may approach up to 100% of the Fund's total net assets if new flows were extremely large relative to the Fund's current assets) in a combination of derivative instruments and other investment companies, including exchange-traded funds ("ETFs"), until such time as the Adviser can identify and invest in appropriate high yield instruments in accordance with the Fund's principal strategy. The Fund may purchase or sell securities on a when-issued, delayed delivery or forward commitment basis. The Fund may, without limitation, seek to obtain market exposure to the securities in which it primarily invests by entering into a series of purchase and sale contracts or by using other investment techniques (such as buy backs or dollar rolls).

In selecting investments for the High Yield (MACS) Fund, the Adviser will consider the risks and opportunities presented by the industries within the high yield universe. PIA evaluates the bond issuers within the selected industries and identifies those investments which the Adviser believes have favorable risk reward characteristics and match the Adviser's investing philosophy. PIA evaluates various criteria such as historical and future expected financial performance, management tenure and experience, capital structure, free cash flow generation, barriers to entry, security protections, yield and

relative value, and ownership structure. Investments are targeted that have individual yield premiums which appear to be favorable and are viewed by the Adviser as having a comparable or lower probability of default and/or loss risk.

PIA MBS Bond Fund

Under normal market conditions, the MBS Bond Fund invests at least 80% of its net assets (plus any borrowings for investment purposes) in mortgage-backed securities, including commercial mortgage-backed securities. In pursuing its objective, the Adviser attempts to provide a return that exceeds the total rate of return of the MBS Index, although there is no guarantee that the Adviser will be able to do so. The MBS Index represents the universe of the fixed rate mortgage-backed pass-through securities issued by the Government National Mortgage Association ("GNMA"), Federal National Mortgage Association ("FNMA") and Federal Home Loan Mortgage Corporation ("FHLMC"). PIA will primarily consider credit quality, effective duration and yield in selecting investments for the Fund's portfolio. The duration of the Fund will generally be in a range of plus or minus 1.5 years of the effective duration of the MBS Index.

The MBS Bond Fund may invest up to 20% of its net assets in futures, options and other derivatives. The Fund may sometimes use derivatives as a substitute for taking positions in bonds and/or as part of a strategy designed to reduce exposure to other risks. The Fund may also utilize the "To Be Announced" ("TBA") market for mortgage-backed securities for up to 100% of its net assets. The TBA market allows investors to gain exposure to mortgage-backed securities with certain broad characteristics (maturity, coupon, etc.) without taking delivery of the actual securities until the settlement date, which is once every month. In addition, the Fund may utilize the dollar roll market, in which one sells, in the TBA market, the security for current month settlement, while simultaneously committing to buy a substantially similar TBA security for next month settlement. The Fund may utilize the dollar roll market for extended periods of time without taking delivery of the securities. The Fund may also invest up to 20% of its net assets in asset-backed securities.

PIA may invest up to 100% of the MBS Bond Fund's total assets in high-quality, short-term debt securities and money market instruments for temporary defensive purposes.

The MBS Bond Fund's annual portfolio turnover rate may exceed 100%.

PIA High Yield Fund

The High Yield Fund invests, under normal circumstances, at least 80% of its net assets (plus any borrowings for investment purposes) in a diversified portfolio of domestic and foreign high yield instruments, defined as bonds ("junk bonds"), convertible securities, forward commitments, loan participations and assignments, preferred stocks and Rule 144A securities. High yield instruments are securities rated below investment grade by the three rating agencies or, if unrated, determined by the Adviser to be of comparable quality.

The remainder of the Fund's assets may be invested in investment grade instruments including bonds, debt securities, convertible securities, and other similar instruments issued by various U.S. and non-U.S. public- or private-sector entities, and loan participations and assignments.

The average portfolio duration of the Fund normally varies within +/- 2 years of the duration of the Bloomberg Barclays U.S. Corporate High-Yield Index (the "Barclays Index") at any point in time. The Barclays Index had a duration of 3.07 years as of January 31, 2020. Duration is a measure of the expected life of a fixed income security that is used to determine the sensitivity of a security's price to changes in interest rates.

The Fund may invest up to 10% of its net assets in securities and instruments that are economically tied to emerging market countries.

The Fund may invest up to 5% of its net assets in derivative instruments, such as options, futures contracts or swap agreements. From time to time, the Fund may experience significant inflows; if this occurs, the Fund may, on a temporary or interim basis, invest these new assets (potentially in an amount which may approach up to 50% of the Fund's total net assets if new flows were extremely large relative to the Fund's current assets) in a combination of derivative instruments and other investment companies, including exchange-traded funds ("ETFs"), until such time as the Adviser can identify and invest in appropriate high yield instruments in accordance with the Fund's principal strategy. The Fund may purchase or sell securities on a when-issued, delayed delivery or forward commitment basis. The Fund may, without limitation, seek to obtain market exposure to the securities in which it primarily invests by entering into a series of purchase and sale contracts or by using other investment techniques (such as buy backs or dollar rolls).

In selecting investments for the Fund, the Adviser will consider the risks and opportunities presented by the industries within the high yield universe. PIA evaluates the bond issuers within the selected industries and identifies those investments which the Adviser believes have favorable risk reward characteristics and match the Adviser's investing philosophy. PIA evaluates various criteria such as historical and future expected financial performance, management tenure and experience, capital structure, free cash flow generation, barriers to entry, security protections, yield and relative value, and ownership structure. Investments are targeted that have individual yield premiums which appear to be favorable and are viewed by the Adviser as having a comparable or lower probability of default and/or loss risk.

PIA Short-Term Securities Fund

The Fund is a diversified investment company that normally invests at least 80% of its net assets in short-term securities having a duration of less than three years. Under normal market conditions, the Fund purchases securities rated BBB- and/or Baa3 or better by a Nationally Recognized Statistical Rating Organization ("NRSRO").

The Fund primarily invests in securities issued or guaranteed by the U.S. Government and its agencies, investment grade mortgage-backed securities (including commercial mortgage-backed securities and residential mortgage-backed securities), and investment grade debt securities (including corporate debt securities, asset-backed securities and collateralized mortgage obligations). The Fund may also invest in Rule 144A securities.

The Fund may invest up to 20% of its net assets in debt futures contracts, option contracts, options on securities and options on debt futures. The Fund may invest in these types of derivative securities for both bona fide hedging purposes and for speculative purposes.

The Fund may invest up to 10% of its net assets in other investment companies (mutual funds and exchange-traded funds [“ETFs”]), including any mutual fund advised by the Adviser (“PIA Fund”), provided that investment in an investment company that predominantly invests in high yield (‘junk bond”) securities will count towards the Fund’s limitation of no more than 5% of the Fund’s net assets invested in high yield securities. To the extent that the Fund invests in a PIA Fund, the Adviser will waive any management fee charged by the PIA Fund.

Duration is a measure of a debt security’s price sensitivity to interest rate fluctuations. Higher duration indicates bonds that are more sensitive to interest rate changes. Bonds with shorter duration have lower risk associated with interest rates. Duration takes into account a debt security’s cash flows over time, including the assumptions about the timing of how a debt security might be prepaid by the issuer or redeemed by the holder prior to its stated maturity date. In contrast, maturity measures only the time until final payment is due. The weighted average duration of the Fund portfolio will generally range from six months on the short end to three years on the long end.

In selecting investments for the Fund, the Adviser primarily will consider credit quality, duration and yield.

Risk of Loss

Although PIA makes every effort to preserve each client’s capital and achieve real growth of wealth, investing in securities involves risk of loss that each client should be prepared to bear.

Investors in PIA’s products may lose money. Success cannot be guaranteed. Risks associated with investments in the types of securities in which PIA invests include:

Active Management Risk

PIA accounts are subject to active management risk because portfolios are actively managed. PIA’s management practices and investment strategies might not produce the desired results.

Adjustable Rate and Floating Rate Securities Risks

Although adjustable and floating rate debt securities tend to be less volatile than fixed-rate debt securities, they nevertheless fluctuate in value. A sudden and extreme increase in prevailing interest rates may cause adjustable and fixed-rate debt securities to decline in value because:

- There may be a time lag between the increases in market rates and an increase in the interest paid on the adjustable or floating rate security;
- There may be limitations on the permitted increases in the interest paid on the adjustable or floating rate security so that the interest paid does not keep pace with increases in market interest rates;

- The duration of adjustable rate securities which are mortgage-backed securities may increase because of slowing of prepayments causing investors to consider these securities to be longer term securities; or

- Securities may decline in credit quality.

Asset-Backed Securities Risk

These risks include Market Risk, Interest Rate Risk, Credit Risk, and Prepayment Risk. Asset-backed securities may decline in value when defaults on the underlying assets occur and may exhibit additional volatility in periods of changing interest rates. When interest rates decline, the prepayment of assets underlying such securities may require PIA to reinvest that money at lower prevailing interest rates, resulting in reduced returns.

Collateralized Mortgage Obligation (CMO) Risk

A CMO is a hybrid between a mortgage-backed bond and a mortgage pass-through security. Similar to a mortgage-backed security, interest and prepaid principal on CMOs is paid, in most cases, monthly. CMOs may be collateralized by whole mortgage loans, but are more typically collateralized by portfolios of mortgage pass-through securities guaranteed by GNMA, FHLMC or FNMA, and their income streams. CMOs may offer a higher yield than U.S. government securities, but they may also be subject to greater price fluctuation and credit risk, as well as liquidity risk.

Convertible Securities Risk

Convertible securities are subject to the risks of both debt securities and equity securities. The values of convertible securities tend to decline as interest rates rise and, due to the conversion feature, tend to vary with fluctuations in the market value of the underlying common or preferred stock.

Counterparty Risk

PIA transactions involving a counterparty are subject to the risk that the counterparty or a third party will not fulfill its obligation to PIA. Counterparty risk may arise because of the counterparty's financial condition (i.e., financial difficulties, bankruptcy, or insolvency), market activities and developments, or other reasons, whether foreseen or not. A counterparty's inability to fulfill its obligation may result in significant financial loss to the client.

Credit Risk

Issuers of the bonds and other debt securities held in PIA portfolios may not be able to make interest or principal payments. Even if these issuers are able to make interest or principal payments, they may suffer adverse changes in financial condition that would lower the credit quality of the security, leading to greater volatility in the price of the security.

Currency Risk

PIA is subject to the risk that foreign currencies will decline in value relative to the U.S. Dollar, or, in the case of hedging positions, that the U.S. Dollar will decline in value relative to the currency being hedged.

Derivatives Risk

PIA may invest in derivative securities for both bona fide hedging purposes and for speculative purposes. A derivative security is a financial contract whose value is based on (or "derived from") a traditional security (such as a bond) or a market index. Derivatives involve the risk of improper valuation, the risk of ambiguous documentation and the risk that changes in the value of the derivative may not correlate closely with the underlying security. Losses from a derivative instrument may be greater than the amount invested in the derivative instrument. Certain derivatives have the potential for unlimited losses, regardless of the size of the initial investment.

Dollar Roll Risk

Dollar rolls involve the risk that PIA's counterparty will be unable to deliver the mortgage-backed securities underlying the dollar roll at the fixed time. If the buyer files for bankruptcy or becomes insolvent, the buyer or its representative may ask for and receive an extension of time to decide whether to enforce PIA's repurchase obligation. In addition, PIA earns interest by investing the transaction proceeds during the roll period. Dollar roll transactions may have the effect of creating leverage in PIA's portfolio.

ETF and Mutual Fund Risk

When PIA invests in an ETF or mutual fund, it will bear additional expenses based on its pro rata share of the ETF's or mutual fund's operating expenses, including the potential duplication of management fees. The risk of owning an ETF or mutual fund generally reflects the risks of owning the underlying securities that the ETF or mutual fund holds. Clients also will incur brokerage costs when PIA purchases ETFs in a client portfolio.

Extension Risk

An issuer may pay principal on an obligation held by the Fund (such as an asset-backed or mortgage-backed security) later than expected. This may happen during a period of rising interest rates. Under these circumstances, the value of the obligation will decrease.

Foreign Securities and Emerging Markets Risk

The value of PIA's foreign investments may be adversely affected by changes in the foreign country's exchange rates, political and social instability, changes in economic or taxation policies, decreased liquidity and increased volatility. Foreign companies may be subject to less regulation than U.S. companies. Events and evolving conditions in certain economies or markets may alter the risks associated with investments tied to countries or regions that historically were perceived as comparatively stable becoming riskier and more volatile. These risks are magnified in countries in "emerging markets." Investment in emerging markets involves additional risks, including less social, political and economic stability, smaller securities markets and lower trading volume, restrictive national policies and less-developed legal structures.

General Market Risk

Economies and financial markets throughout the world are becoming increasingly interconnected, which increases the likelihood that events or conditions in one country or region will adversely impact markets or issuers in other countries or regions. Securities in the Fund's portfolio may underperform in comparison to securities in general financial markets, a particular financial market or other asset classes, due to a number of factors, including inflation (or expectations for inflation), interest rates, global demand for particular products or resources, natural disasters or events, terrorism, regulatory events and government controls.

Government-Sponsored Entities Risk

PIA invests in securities issued or guaranteed by government-sponsored entities, including GNMA, FNMA and FHLMC. However, these securities may not be guaranteed or insured by the U.S. Government and may only be supported by the credit of the issuing agency.

High Yield Securities Risk

Securities with ratings lower than BBB- or Baa3 by a Nationally Recognized Statistical Rating Organization ("NRSRO") are known as "high yield" securities. High yield securities provide greater income and opportunity for gains than higher-rated securities but entail greater risk of loss of principal.

Interest Rate Risk

In general, the value of bonds and other debt securities falls when interest rates rise. Longer term obligations are usually more sensitive to interest rate changes than shorter term obligations.

Leverage Risk

The use of leverage can enhance investment returns. Leverage, however, also increases risks. The use of leverage increases the risk of loss resulting from various factors, including rising interest rates, increased interest rate volatility, downturns in the economy and reductions in the availability of financing or deterioration in the conditions of any of the portfolio investment assets.

Liquidity Risk

Reduced liquidity in the bond markets can result from a number of events, such as limited trading activity, reductions in bond inventory, and rapid or unexpected changes in interest rates. Low or lack of trading volume may make it difficult to sell securities held in PIA portfolios at quoted market prices.

Loan Participation and Assignment Risk

Loan participations and assignments involve special types of risk, including credit risk, interest rate risk, liquidity risk, and the risks of being a lender. Bank loans (i.e., loan participations and assignments), like other high yield corporate debt obligations, have a higher risk of default and may be less liquid and/or become illiquid.

Market Risk

The prices of the securities in which PIA invests may decline for a number of reasons, including in response to economic developments and perceptions about the creditworthiness of individual issuers.

Market and Regulatory Risk

Events in the financial markets and economy may cause volatility and uncertainty and adversely impact the Fund's performance. These events have included, but are not limited to: corporate bankruptcies or restructurings, and other events related to the sub-prime mortgage crisis; governmental efforts to limit short selling and high frequency trading; measures to address U.S. federal and state budget deficits; social, political, and economic instability in Europe; economic stimulus by the Japanese central bank; steep declines in oil prices; dramatic changes in currency exchange rates; pandemics, epidemics and other similar circumstances in one or more countries or regions; and China's economic slowdown. Interconnected global economies and financial markets increase the possibility that conditions in one country or region might adversely impact issuers in a different country or region. Traditionally liquid investments may experience periods of diminished liquidity. Governmental and regulatory actions, including tax law changes, may also impair portfolio management and have unexpected or adverse consequences on particular markets, strategies, or investments. The Fund's investments may decline in value due to factors affecting individual issuers (such as the results of supply and demand), or sectors within the securities markets. The value of a security or other investment also may go up or down due to general market conditions that are not specifically related to a particular issuer, such as real or perceived adverse economic conditions, changes in interest rates or exchange rates, or adverse investor sentiment generally. In addition, unexpected events and their aftermaths, such as the spread of deadly diseases; natural, environmental or man-made disasters; financial, political or social disruptions; terrorism and war; and other tragedies or catastrophes, can cause investor fear and panic, which can adversely affect the economies of many companies, sectors, nations, regions and the market in general, in ways that cannot necessarily be foreseen.

Portfolio Turnover Risk

A high portfolio turnover rate (100% or more) has the potential to result in the realization and distribution to shareholders of higher capital gains, which may subject clients to a higher tax liability. A high portfolio turnover rate also leads to higher transactions costs.

Preferred Stock Risk

Preferred stocks may be more volatile than fixed income securities and are more correlated with the issuer's underlying common stock than fixed income securities. Additionally, the dividend on a preferred stock may be changed or omitted by the issuer.

Prepayment Risk

Issuers of securities held in PIA portfolios may be able to prepay principal due on these securities, particularly during periods of declining interest rates. Securities subject to prepayment risk generally offer less potential for gains when interest rates decline, and may offer a greater potential for loss when interest rates rise. When debt obligations are prepaid or when securities are called, PIA may have to reinvest in securities with a lower yield. Prepayment risk is a major risk of mortgage-backed securities.

Risks Associated with Asset-Backed Securities

These include Market and Regulatory Risk, Interest Rate Risk, Credit Risk, Prepayment Risk and Extension Risk (each described above). During periods of difficult or frozen credit markets, significant changes in interest rates, or deteriorating economic conditions, such securities may decline in value, face valuation difficulties, become more volatile and/or become illiquid.

Risks Associated with Inflation and Deflation

Inflation risk is the risk that increasing prices throughout the economy may erode the purchasing power of an investment over time. Deflation risk is the risk that prices throughout the economy decline over time, which is the opposite of inflation.

Risks Associated with Mortgage-Backed Securities

These risks include Market Risk, Interest Rate Risk, Credit Risk, Prepayment Risk, and Extension Risk, as well as the risk that the structure of certain mortgage-backed securities may make their reaction to interest rates and other factors difficult to predict, making their prices volatile.

Risks Associated with Real Estate and Regulatory Actions

Although some of the securities in the Fund are expected to either have a U.S. Government sponsored entity guarantee or be AAA rated by the three rating agencies, if real estate experiences a significant price decline, this could adversely affect the prices of the securities PIA owns. Any adverse regulatory action could impact the prices of the securities the Fund owns.

Rule 144A Securities Risk

The market for Rule 144A securities typically is less active than the market for publicly-traded securities. Rule 144A securities carry the risk that the liquidity of these securities may become impaired, making it more difficult for the Fund to sell these securities.

Small Cap Equity Securities Risk

Investments in small-sized companies often pose greater risks than those typically associated with larger, more established companies. Examples include increased volatility of earnings and prospects, higher failure rates, and limited markets, product lines or financial resources.

To Be Announced ("TBA") Securities Risk

PIA may invest in TBA securities. In a TBA transaction, a seller agrees to deliver a security at a future date, but does not specify the particular security to be delivered. Instead, the buyer agrees to accept any security that meets specified terms. TBA transactions involve the risk that the securities received may have less favorable characteristics than what was anticipated when PIA entered into the transaction. PIA accounts with TBA securities are also subject to counterparty risk and will be exposed to changes in the value of the underlying investments during the term of the agreement.

U.S. Government Securities Risk

Some U.S. Government securities, such as Treasury bills, notes, and bonds and mortgage-backed securities guaranteed by the Government National Mortgage Association (Ginnie Mae), are supported by the full faith and credit of the United States; others are supported by the right of the issuer to borrow from the U.S. Treasury; others are supported by the discretionary authority of the U.S. Government to purchase the agency's obligations; still others are supported only by the credit of the issuing agency, instrumentality, or enterprise. Although U.S. Government-sponsored enterprises may be chartered or sponsored by Congress, they are not funded by Congressional appropriations, and their securities are not issued by the U.S. Treasury, their obligations are not supported by the full faith and credit of the U.S.

Government, and so investments in their securities or obligations issued by them involve greater risk than investments in other types of U.S. Government securities. In addition, certain governmental entities have been subject to regulatory scrutiny regarding their accounting policies and practices and other concerns that may result in legislation, changes in regulatory oversight and/or other consequences that could adversely affect the credit quality, availability or investment character of securities issued or guaranteed by these entities.

The events surrounding the U.S. federal government debt ceiling and any resulting agreement could adversely affect the Fund's ability to achieve its investment objective. On August 5, 2011, S&P lowered its long-term sovereign credit rating on the U.S. The downgrade by S&P and other future downgrades could increase volatility in both stock and bond markets, result in higher interest rates and lower Treasury prices and increase the costs of all kinds of debt. These events and similar events in other areas of the world could have significant adverse effects on the economy generally and could result in significant adverse impacts on issuers of securities held by the Fund and the Fund itself. PIA cannot predict the effects of these or similar events in the future on the U.S. economy and securities markets or on the Fund's portfolio. PIA may not timely anticipate or manage existing, new or additional risks, contingencies or developments.

In recent periods, the values of U.S. Government securities have been affected substantially by increased demand for them around the world. Changes in the demand for U.S. Government securities may occur at any time and may result in increased volatility in the values of those securities.

Disciplinary Information

PIA does not have disciplinary information to report.

Other Financial Industry Activities and Affiliations

Mutual Funds

PIA is the investment adviser to five (5) mutual funds: PIA BBB Bond Fund, MACS; PIA High Yield Fund; PIA High Yield (MACS) Fund; PIA MBS Bond Fund, MACS and PIA Short-Term Securities Fund, which are overseen by U.S. Bancorp Fund Services and the Advisors Series Trust ("AST"). PIA's financial interests in the Funds include investment advisory fees and share ownership. Additionally, PIA employees, including portfolio managers of the PIA Funds are allowed to purchase, hold and sell PIA Funds in their personal accounts. Please see *Fees and Compensation* and *Investment Strategies* for more information on PIA's mutual funds.

Anworth Mortgage Asset Corporation and Anworth Management, LLC

Lloyd McAdams, PIA's President and Heather Baines, PIA's Chairman jointly own approximately 1.42% of the issued stock in Anworth Mortgage Asset Corporation ("Anworth Mortgage"), a NYSE-listed mortgage REIT.

Lloyd McAdams, PIA's President, Heather Baines, PIA's Chairman, and Joseph McAdams, a PIA Managing Director own all of the outstanding membership interests of Anworth Management, LLC ("Anworth Management"), a Portfolio Manager for a pooled investment vehicle (other than an investment company). Lloyd McAdams also serves as the Managing Member of Anworth Management. Joseph McAdams became Chief Executive Officer of Anworth Mortgage on September 30, 2018, and he serves as Anworth Mortgage's President, Chief Executive Officer and Chief Investment Officer. Additionally, other officers and employees of PIA are also officers of Anworth Mortgage and members and employees of Anworth Management.

Anworth Management is the external manager for Anworth Mortgage and a relying adviser of PIA, the filing adviser. In exchange for portfolio management services, Anworth Management receives a management fee based on a percentage applied to the equity of Anworth Mortgage as defined in the Management Agreement.

Each officer and employee receives compensation from Anworth Management. Although such persons are under no contractual obligation to devote any minimum amount of their time to PIA, each has

defined roles and responsibilities that must be fulfilled.

Anworth Mortgage is party to a sublease agreement and an administrative services agreement with PIA. In consideration of the administrative services provided by PIA, Anworth Mortgage pays PIA a fee in accordance with the administrative services agreement. Under the sublease agreement, Anworth Mortgage leases office space from PIA at the Santa Monica location.

PIA employees who are also officers of Anworth Mortgage and employees of Anworth Management may, in their capacity as an officer or employee of Anworth Management, effect trades for Anworth Mortgage's account. From time to time, Anworth employees will advise PIA with respect to investment strategy. For more information on possible conflicts of interest and how PIA addresses those potential conflicts, please see *Code of Ethics, Personal Trading and Participation or Interest in Client Transactions*.

Syndicated Capital

PIA's President, Lloyd McAdams, and PIA's Chairman, Heather U. Baines, are sole stockholders of Syndicated Capital, Inc. ("Syndicated Capital"), a registered broker-dealer, registered investment adviser and general insurance agency. PIA has no direct or indirect dealings with Syndicated Capital's registered investment adviser.

PIA does not execute trades through Syndicated Capital's broker-dealer, unless directed to do so by a client, which PIA discourages. If so directed, this could act as an incentive for Mr. McAdams to direct transactions to Syndicated Capital; and should Syndicated Capital accrue any profit or other benefit from executing trades for PIA's clients, Mr. McAdams would benefit from the revenue received by Syndicated Capital. Additionally, Mr. McAdams has accounts invested in equities strategies, in which trades are directed to Syndicated Capital's broker-dealer.

Some of PIA's employees are registered representatives of Syndicated Capital, Inc., and in that capacity they may receive compensation in relation to client account securities transactions executed through Syndicated Capital. Therefore, the receipt of this compensation could act as an incentive for such employees to execute transactions through Syndicated Capital, even if best execution could be achieved elsewhere. Additionally, should Syndicated Capital accrue any profit or other benefit from executing trades for PIA's clients, Lloyd McAdams will receive personal economic benefits from the revenue received by Syndicated Capital.

Palisades Investment Partners

Quinn R. Stills is a PIA employee and the founder, Chief Investment Officer and Investment Committee Chairman of Palisades Investment Partners, LLC, an asset management firm headquartered in Santa Monica, California. Palisades Investment Partners is a separate investment advisory firm from PIA. Mr. Stills is a dual employee of Palisades Investment Partners and PIA, and simultaneously receives income from both entities. Dual employees may give advice and take action with respect to Palisades Investment Partners that may differ from advice given or the timing or nature of action taken with respect to any PIA client account. These dual roles impose multiple responsibilities that may create a conflict of interest of which clients should be aware. PIA mitigates this conflict, when necessary, by

block trading securities of PIA and Palisades when the two firms are trading in the same security. Prices will be averaged, allocated pro-rata and commissions will be the same across both firms.

PIA Farmland, Inc.

Lloyd McAdams, PIA's President is the sole director and Chairman of PIA Farmland, Inc. ("PIA Farmland"). Heather Baines, PIA's Chairman, and Joseph McAdams, a PIA Managing Director, are officers and employees of PIA Farmland and serve on its Investment Committee. PIA Farmland is a privately-held real estate investment trust incorporated in February 2013 that invests in U.S. farmland properties to lease to independent farm operators. Other officers and employees of PIA, Anworth Mortgage and Anworth Management are also officers and employees of PIA Farmland.

PIA is the external manager of PIA Farmland and, in exchange for portfolio management and other related services, receives a management fee based on a percentage of the Total Assets of PIA Farmland, as defined in the Management Agreement between PIA and PIA Farmland. For each of the first five fiscal years of PIA Farmland, PIA agreed to reimburse PIA Farmland any amount that the sum of the management fee plus certain other expenses (as defined in the Management Agreement) exceeds 1.9% of Total Assets, but not in an amount that exceeds the management fee.

PIA Farmland has also entered into an Administrative Services Agreement and a Sublease Agreement with PIA. In exchange for the services provided, PIA will receive fees in accordance with those agreements.

PIA has also agreed to pay on behalf of PIA Farmland various organizational and offering costs. Those costs will only be reimbursed by PIA Farmland when its total stockholders' equity at the end of a calendar quarter exceeds $20 million.

PIA has not, in the past, managed a portfolio of farmland properties. PIA does not and will not make loans to or investments in any company with which PIA Farmland has, or intends to enter into, a lease and will not co-invest with PIA Farmland in any real estate transaction.

Additional Activities

PIA is a member of a limited liability company not offered to the public and formed to own a farm in Nebraska. PIA receives compensation for serving as the Administrative Member to the LLC, providing administrative services.

Code of Ethics, Personal Trading and Participation or Interest in Client Transactions

Code of Ethics and Personal Trading

To avoid potential conflicts of interest, PIA has adopted a Code of Ethics ("Code"). This Code provides employees with guidance in their ethical obligations to clients and governs their personal securities trading activities. PIA and its employees owe a duty of loyalty, fairness and good faith towards their clients, and the obligation to adhere to the general principles of the Code. The Code prohibits the holding of certain securities and outlines PIA's expectations to report personal trading, including exceptions to such reporting, reporting of political contributions, reporting of gifts, entertainment and other forms of non-cash compensation, and escalation and enforcement processes. A copy of PIA's Code in its entirety is available upon written request.

Some employees may transact in the same securities as the client account. In those situations, the account is a PIA advisory account, all trades are reviewed and approved by management and specific pre-determined allocation procedures are followed.

Under unique circumstances, the CCO may in her discretion permit an employee to sell a PIA watch list security in his/her Personal Account if it is determined that there would be no impact to PIA clients.

Participation or Interest in Client Transactions

Anworth Mortgage Asset Corporation

Although PIA does not recommend Anworth Mortgage securities for its client's portfolios, some clients may nevertheless own Anworth securities in their portfolio. In this event PIA neither charges a fee nor includes the securities in the calculation of assets under management.

The officers and employees of PIA who are also officers and employees of Anworth Management, LLC may recommend the same MBS to PIA clients and Anworth Mortgage. PIA believes that any potential conflicts of interest are mitigated in part by the fact that the MBS market is characterized by an abundance of available securities. The supply of MBS typically targeted by Anworth Mortgage and PIA client accounts is rarely insufficient. However, in the unlikely event that there is an insufficient supply to satisfy the competing demands of Anworth Mortgage and PIA clients, dual employees are required to attempt to mitigate such conflicts by determining whether the investment in question is more suitable for Anworth Mortgage or PIA clients based on their respective investment strategies and guidelines relating to acquisition of assets, leverage, liquidity and other factors that such dual employees

determine to be appropriate. Dual employees may give advice and take action with respect to ANH's account that may differ from advice given or the timing or nature of action taken with respect to any PIA client account. PIA makes available copies of the latest annual report of ANH to all PIA clients upon written request. For more information on PIA's affiliation with ANH see the *Other Financial Industry Activities and Affiliations* section of this brochure.

Mutual Funds

PIA is the investment adviser to five (5) mutual funds: PIA BBB Bond Fund, MACS; PIA High Yield Fund; PIA High Yield (MACS) Fund; PIA MBS Bond Fund, MACS and PIA Short-Term Securities Fund, which are overseen by U.S. Bancorp Fund Services and the Advisors Series Trust ("AST"). PIA's financial interests in the Funds include investment advisory fees and share ownership. Additionally, PIA employees, including portfolio managers of the PIA Funds are allowed to purchase, hold and sell PIA Funds in their personal accounts. Please see *Fees and Compensation* and *Investment Strategies* for more information on PIA's mutual funds.

Brokerage Practices

Selecting Brokerage Firms & Best Execution

When the Firm has full discretion to select broker-dealers, PIA takes a two-step approach to selecting broker-dealers and executing client transactions. First, PIA's Portfolio Management Team creates and periodically updates an Approved Broker List of those broker-dealers it believes provide a sufficiently high level of qualitative service for its fixed income clients. The Portfolio Management Team considers the following factors when creating and maintaining the Approved Broker List: execution capabilities; the confidentiality provided by the broker; availability of technological aids to process trade data; opportunity for price improvement; the promptness of execution of securities transactions; competent block trading coverage ability, if necessary; capital strength and stability; reliable and accurate communications and settlement capabilities; administrative ability; knowledge of other buyers and sellers; the broker's ability and willingness to position a portion of the order; the financial stability of the broker-dealer; research provided; breadth of services provided to clients; and availability of information regarding the most favorable market for executing the trade. Second, when executing trades, Portfolio Managers and Traders are permitted only to use those broker-dealers that are on the Approved Broker List. Best execution for a client is accomplished through timely submission of electronic or other bids/letters to the broker-dealers offering the best price.

The reasonableness of brokerage bid/ask spreads is a factor PIA's Portfolio Management Team considers when maintaining its Approved Broker List. It is PIA's opinion that the expectation of a broker-dealer to receive a reasonable bid/ask spread or profit is necessary to maintain PIA's ability to benefit from effective communication, quality executions and brokerage services and transactions with that broker-dealer. This is an important consideration when PIA negotiates bid/ask spreads with broker-dealers. Notwithstanding PIA's approach of selecting the approved broker-dealer offering the best transaction price on a transaction by transaction basis, this may still result in a client paying a commission higher than that obtainable from some other broker-dealers.

Fixed income securities are often purchased from the issuer or a primary market maker acting as a principal on a net basis with no brokerage commission paid directly by the client. Such securities may also be purchased from underwriters at net prices that include underwriting fees.

By following the above processes, PIA attempts to achieve best execution and mitigates the conflict of interest that may be produced by the association with Syndicated Capital as discussed in the *Other Financial Industry Activities and Affiliations* section of this brochure.

Research and other Soft Dollar Benefits

Section 28(e) of the Securities Exchange Act of 1934 provides a "safe harbor" to investment advisers who use commission dollars of their advised accounts to obtain investment research and brokerage

services that provide lawful and appropriate assistance to the adviser in performing investment decision-making responsibilities. Conduct outside of the safe harbor of Section 28(e) is subject to the traditional standards of fiduciary duty under state and federal law.

PIA will not enter into any formal “soft dollar commitments/arrangements”, written or verbal, explicit or implied, with any broker-dealers. A soft dollar commitment/arrangement is viewed by PIA as a commitment, understanding or agreement to pay increased commissions, or direct trades to a broker-dealer, in exchange for the receipt of research. PIA may, however, effect transactions for clients with broker-dealers who provide PIA with research or brokerage products and services, providing lawful and appropriate assistance to the Firm in the performance of its investment decision-making responsibilities. Research and brokerage products and services received from broker-dealers are supplemental to PIA's own research efforts. PIA does not separately compensate broker-dealers with soft dollars for such products and services. As noted above, the Portfolio Management Team considers the full range and quality of a broker-dealer's services when placing brokerage to ensure that transactions are the most favorable under the circumstances.

Directed Brokerage

PIA does not direct, recommend, request or require that its clients direct us to execute transactions through a specified broker-dealer. PIA does accept and will place orders with brokerage firms pursuant to direction received from investment advisory clients ("directed brokerage"). If a client or wrap-fee sponsor specifically directs PIA to use a particular broker-dealer, such clients and/or the appropriate wrap-fee sponsor will not be able to participate in aggregate trades, and may incur higher commission rates than other clients who allow PIA to have full brokerage discretion. These clients may also receive less favorable prices and execution. In most of PIA’s wrap-fee arrangements, the program sponsor directs PIA to use its own or affiliated broker-dealer to effect wrap-fee client transactions.

Order Aggregation

Where possible, and when advantageous to clients, PIA will aggregate trades of accounts. Trade aggregation, or “bunching of orders,” generally results in better execution and/or better-realized prices. Because of prevailing market conditions, it may not be possible to execute all shares of an aggregated trade, in which case PIA will allocate the trade among participating accounts in accordance with PIA’s Allocation and Aggregation of Orders Policy.

In order to ensure that all portfolios are treated fairly, it occasionally becomes necessary to use an allocation process in those situations in which the security purchased is not in a sufficient quantity to be distributed to all portfolios in the desired portfolio holding percentage. The Portfolio Manager determines which process is fair and equitable with respect to the portfolios they manage. The methods employed include “pro-rata,” whereby the same percentage is allocated to all portfolios even though the percentage is less than a normal allocation; and “rotation” whereby a full allocation is given to one group of portfolios and the next allocation is given to another group which rotates so that an attempt is made to give all groups an allocation over time.

Review of Accounts

Periodic Reviews

The Investment Strategy Group is responsible for overseeing material changes to both the institutional SMAs and retail wrap-fee program portfolio strategies. However, the day-to-day portfolio decisions on implementing a portfolio strategy for each account are performed by PIA's Portfolio Managers. All portfolios are reviewed by Portfolio Managers on an ongoing basis. Furthermore, all accounts are reviewed at least quarterly by a Portfolio Manager to evaluate compliance with client objectives and to analyze portfolio rates of return.

Review Triggers

More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment. If a rating on a security is downgraded below the minimum in the client's investment guidelines, the security will be reviewed by the Portfolio Manager for potential sale.

Regular Reports

PIA makes available to its separately managed clients and fund administrators written quarterly account summary reports, which include performance, portfolio appraisals, transactions and cash and asset holdings. PIA will also deliver the following reports to clients upon written request: asset listings, rate of return evaluations, economic analysis reports, asset allocation reports and investment strategy reports.

Client Referrals and Other Compensation

Economic Benefit

In exchange for commissions generated by discretionary trading activity, PIA may from time to time receive research services from a variety of brokerage firms. See the *Research and Other Soft Dollar Benefits* section for more information. PIA may also direct brokerage to firms who refer clients to the firm. See the *Brokerage Practices* section of this Brochure for a description of the services and benefits PIA may receive from brokerage firms.

Referrals

Although PIA currently has no solicitation agreements, it may in the future. The fee is equal to a percentage of the aggregate assets of the client who agrees to the solicitation arrangement. Client referral and solicitation arrangements by nature present an inherent conflict of interest between the adviser and client. As such, PIA will comply with Rule 206(4)-3 (the "Cash Solicitation Rule") under the Investment Advisers Act of 1940, which requires, among other things, that PIA not compensate any party for client referrals without a written agreement. This rule also requires that prospective clients be provided disclosures by the third party, which clearly describes the solicitation terms and compensation arrangement. The advisory fees charged to clients are not increased in any way as a result of the referral fees paid by PIA to persons referring clients.

Custody

Custody

PIA is not a broker-dealer and does not take possession of client assets.

Our clients' assets are housed in nationally recognized banks or brokerage firms, otherwise known as custodians. PIA has a limited power of attorney to place trades on the client's behalf. PIA does not have the authority to directly debit client accounts for quarterly fees, though the client may direct its custodian to automatically debit and remit fees to PIA. See the *Fee Billing* section of this brochure. PIA requires that the custodian, selected by the Client, send quarterly, or more frequent, account statements directly to our Clients. We urge Clients to compare the account statements they receive from the qualified custodian with those reports they receive from PIA (if requested).

Account Statements

The client will receive account statements directly from the broker-dealer, bank or other qualified custodian. PIA urges the client to compare the statement the client receives from the qualified custodian with any holdings report the client may receive from PIA.

Investment Discretion

Discretionary Authority for Trading & Limited Power of Attorney

Unless otherwise agreed with a client in writing, PIA has complete discretion, in accordance with a limited power of attorney authorized in writing in the client's investment management agreement, over the selection of brokers and selection and amount of securities to be bought or sold without obtaining specific client consent. The only limitation on this discretion is that PIA must manage all client accounts in accordance with the portfolio's guidelines, applicable client restrictions and/or investment policy statements, and mutual fund investment guidelines.

Voting Client Securities

Proxy Votes

In 2003 the Securities and Exchange Commission ("SEC") adopted Rule 206(4)-6 requiring formal proxy voting policies and procedures for SEC-registered investment advisers with voting authority over client portfolio securities. Pursuant to this rule, PIA has adopted a policy to vote proxies for portfolio securities, consistent with the best interests of its clients unless any client explicitly retains responsibility for proxy voting. PIA maintains written policies and procedures for the handling, research, voting and reporting of proxy voting, and makes appropriate disclosures about its proxy policies and practices.

Any conflict or potential conflict of interest that arises in the execution of PIA's proxy voting responsibilities will be referred to PIA's Compliance Committee who will review and resolve any such conflict in the best interest of all affected clients by either deciding how to vote the proxy or (unless the client is an ERISA client) requesting the client to vote their own proxies or abstain from any voting. In all cases, the conflict and any specific action taken will be disclosed to all affected clients.

Unless directed otherwise by a client in writing, PIA will vote the proxy for its clients. If the client chooses to vote its own proxy, the proxy is made available through the custodian. At the client's request, PIA will be happy to consult with the client regarding items up for vote. Additionally, the client may direct PIA to vote proxies in a manner the client desires.

Other than for the five (5) PIA mutual funds, PIA will not advise upon or conduct or participate in any litigation, such as class action litigation, on behalf of clients arising from the client's ownership of assets held in the client's account. For example, if an issuer defaults on a bond, PIA will not advise any client on the merits of pursuing an adverse legal claim against the issuer and will not conduct any such claim on the client's behalf.

A complete copy of PIA's current Proxy Voting Policies and Procedures is available to clients upon written request. In addition, clients may obtain full information regarding how PIA has voted proxies for their account at any time by contacting PIA via phone at 310-255-4400, or by inquiring with their main contact at PIA.

Financial Information

PIA has never been the subject of a bankruptcy petition and PIA is not aware of any financial condition that is reasonably likely to impair our ability to meet our contractual commitments to clients. However, should PIA at some future date, file for bankruptcy or should the principal owners decide to withdraw their capital, PIA may no longer be able to meet its contractual commitments to clients.

Additional Disclosures

Business Continuity Plan

PIA has created and implemented a Business Continuity Plan ("BCP") to recover from a significant business disruption and maintain critical business operations in the event of a catastrophic emergency. PIA is continually enhancing and developing procedural safeguards, which will allow PIA to minimize downtime in the face of a significant business disruption ("SBD"), such as natural disasters, pandemics, geopolitical events, terrorist acts, and electric or IT outages.

For BCP purposes, catastrophic emergencies are categorized as "regional disruptions" or "localized disruptions." Regional disruptions include such issues as earthquake, flood, fire or terrorist act(s). Localized disruptions include such issues as power outages, telephone and Internet disconnections and server or computer systems failure. Contagion-related events such as pandemics or epidemics may be either regional or localized disruptions, depending on the scope of the outbreak and the extent of restrictions placed on residents and businesses by public health protocols and mandates.

The BCP provides for data back-up and recovery in both hard copy and electronic format as well as in remote locations. In the event of a disaster or operational disruption, all employees will go to the company Intranet for the most recent version of our Disaster Recovery ("DR") Plan and other disaster updates.

PIA utilizes Agility Recovery Solutions, a company who will provide a mobile hotsite within 48 hours in the event of a disaster, with up to 40 employee stations. Additionally, PIA's IT infrastructure is designed to allow employees the ability to work remotely via Remote Desktop.

PIA's BCP is formally tested annually. PIA has also created and implemented a Succession Plan to enable PIA to continue to manage client assets on in the event of an unexpected death or disability of a company principal.

Privacy Notice

The relationship between PIA and our customers is our most important asset. PIA strives to maintain its clients' trust and confidence by protecting confidential client information (including former clients) to the best of our ability. PIA is committed to protecting current and former clients' privacy and will not disclose personal information to anyone unless it is required by law, at the client's direction, or is permitted by law and is necessary to provide clients with advisory services. PIA has not sold and will not sell personal information to any third party.

Personal Information PIA Collects and Communicates

The primary reason PIA collects and maintains personal information is to service our clients and administer the customer relationship. The types and categories of information PIA collects may include the following:

- Information received on applications and/or other documents to provide investment advice, including the client's name, home address, social security number, email address and telephone number;
- Information about client's net worth; and
- Information that PIA may receive from third parties.

In order for PIA to administer client accounts, we may disclose this personal information that we collect as permitted by law, to service client accounts. Examples include providing account information to companies that perform administrative services, such as printing and mailing client invoices or company newsletters. These companies must use this information solely for the services for which PIA hired them and are not permitted to use, reuse or share this information for any other purpose. PIA does not provide personal client information to affiliates for marketing purposes.

How PIA Protects Personal Information

To fulfill its privacy commitment, PIA has instituted practices to safeguard the information maintained about our clients. These include:

- Maintaining physical, electronic and procedural safeguards that comply with government requirements to keep personal information safe;
- Limiting access to personal information to PIA personnel who need it;
- Proper destruction and disposal of client documents;
- Taking the appropriate steps to ensure that third parties who perform services for PIA agree to keep company and/or personal information secure and confidential; and
- Protecting the personal information of former clients to the same extent as current clients.

PIA will update its policies and procedures whenever necessary in an effort to ensure that client's privacy is maintained. If we make any material changes to our privacy policy, we will promptly make that information available to clients.

Anti-Money Laundering and Anti-Terrorist Policies & Procedures

PIA takes reasonable steps to detect terrorist activities in its client accounts. Specifically PIA reviews client accounts upon opening and reports any information to the authorities necessary in order to comply with the Presidential Executive Order and the United Nations Suppression of Terrorism Regulations.

Prior to opening an account, PIA's Anti-Money Laundering Officer, verifies client information against databases such as OFAC, FATF and FinCEN to check for potential matches. In the event that PIA discovers a potential match, PIA reports its findings to the FBI and applicable financial regulators, such as the SEC. PIA will take any necessary action to freeze said open accounts for any persons or entities that are on the terrorist list and report the information to the relevant authorities.

In addition, at least annually, PIA provides training to our employees on our anti-money laundering and anti-terrorist policies and procedures. PIA notifies senior management and reports transactions relating to known and suspected federal crimes, including potential securities law violations.

Pacific Income Advisers, Inc.

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This brochure provides information about the qualification and business practices of Pacific Income Advisers, Inc. ("PIA"). If you have any questions about the contents of this brochure, please contact us at (310) 393-1424, or by email at info@pacificincome.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC"), or by any state securities authority.

Additional information about Pacific Income Advisers, Inc. is available on the SEC's website at www.adviserinfo.sec.gov. Registration does not imply a certain level of skill or training.

March 26, 2020

ADV Part 2 - Brochure Supplement

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This brochure supplement provides information about Lloyd McAdams, Heather U. Baines, Joseph E. McAdams, Daniel F. Meyer, Bistra Pashamova, Hsin Tong, Rory Hargaden, Michael Yean, Quinn R. Stills and Brett Roth that supplements the Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Additional information about Lloyd McAdams, Heather U. Baines, Joseph E. McAdams, Daniel F. Meyer, Bistra Pashamova, Hsin Tong, Rory Hargaden, Michael Yean, Quinn R. Stills and Brett Roth is available on the SEC's website at www.adviserinfo.sec.gov, and/or on PIA's site, www.pacificincome.com.

March 26, 2020

Lloyd McAdams, CFA, CEBS

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Additional information about Lloyd McAdams is available on the SEC's website at www.adviserinfo.sec.gov.

Lloyd McAdams, CFA, CEBS

Education and Business Experience

Lloyd McAdams, CFA, CEBS was born in 1945. Mr. McAdams co-founded PIA in 1986 and serves as President and Portfolio Manager of PIA. Mr. McAdams received his M.B.A. from University of Tennessee and his undergraduate degree from Stanford University with a major in Statistics.

Professional Designations

CFA

Mr. McAdams received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

CEBS

Mr. McAdams received a Certified Employee Benefits Specialist designation. The Certified Employee Benefits Specialist (CEBS) designation, sponsored by International Foundation of Employee Benefit Plans and the Wharton School of the University of Pennsylvania, is a five-course (formerly an eight-course) curriculum that focuses on group benefits, retirement and compensation.

Disciplinary Information

Mr. McAdams does not have disciplinary information to report.

Other Business Activities

Since 1991, Mr. McAdams has served as Chairman and is a registered principal and sole stockholder of Syndicated Capital, Inc. ("Syndicated Capital"), a registered broker-dealer, registered investment adviser and general insurance agency. PIA has no direct or indirect dealings with Syndicated Capital's registered investment adviser. This relationship may act as an incentive to Mr. McAdams to execute transactions through Syndicated Capital even if best execution could be achieved elsewhere. Additionally, should Syndicated Capital accrue any profit or other benefit from executing trades for PIA's clients, Mr. McAdams will receive personal economic benefits from the revenue received by Syndicated Capital. As a result, PIA does not execute trades through Syndicated Capital, unless directed to do so by a client.

Mr. McAdams is a Board Member of Anworth Mortgage Asset Corporation (ANH), a NYSE-listed mortgage REIT. Mr. McAdams served from 1997 to 2018 as ANH's Chairman and Chief Executive Officer. Since March 14, 2011, Mr. McAdams has served as Managing Member of Anworth Management, LLC.

Although PIA clients may own ANH securities in their portfolios, PIA does not recommend ANH securities and if owned in a PIA portfolio, PIA will not charge an investment management fee for any ANH security in the portfolio.

Both PIA and ANH invest in mortgage-backed securities ("MBS"). However, PIA believes that such ANH conflicts are mitigated in part by the fact that the MBS market is characterized by an abundance of available securities and the supply of MBS typically targeted by ANH and PIA client accounts, is rarely insufficient. However, in the unlikely event that there is an insufficient supply to satisfy the competing demands of ANH and PIA's clients, dual employees are required to attempt to mitigate such conflicts by determining whether the investment in question is more suitable for ANH or PIA clients based on their respective investment strategies and guidelines relating to acquisition of assets, leverage, liquidity and other factors that such dual employees determine to be appropriate. Dual employees may give advice and take action with respect to ANH's account that may differ from advice given or the timing or nature of action taken with respect to any PIA client account. PIA makes available copies of the latest annual report of ANH to all PIA clients upon written request. For more information on PIA's association with ANH see the *Other Financial Industry Activities and Affiliations* section of this brochure.

Mr. McAdams devotes a portion of his time to Anworth Management in capacities that could create conflicts of interest that may harm PIA's investment opportunities; this lack of a full-time commitment could also harm PIA's operating results. Although Mr. McAdams is under no contractual obligation to devote any minimum amount of his time to PIA, he has defined roles and responsibilities that must be fulfilled.

Additional Compensation

Mr. McAdams receives annual compensation for his roles at Syndicated Capital and Anworth Management, LLC.

Supervision

As President and Portfolio Manager of PIA, Mr. McAdams is not directly supervised. However, he does report to the Board of Directors for overall supervision.

Heather U. Baines

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Heather U. Baines

Education and Business Experience

Heather U. Baines was born in 1941. Ms. Baines co-founded PIA in 1986 and serves as the Chairman of PIA. Ms. Baines received her Bachelor of Arts degree in Business from Antioch College.

Disciplinary Information

Ms. Baines does not have disciplinary information to report.

Other Business Activities

Since March 14, 2011, Ms. Baines has served as a Member of Anworth Management, LLC.

Although PIA clients may own ANH securities in their portfolios, PIA does not recommend ANH securities and if owned in a PIA portfolio, PIA will not charge an investment management fee for any ANH security in the portfolio.

Both PIA and ANH invest in mortgage-backed securities ("MBS"). However, PIA believes that such ANH conflicts are mitigated in part by the fact that the MBS market is characterized by an abundance of available securities and the supply of MBS typically targeted by ANH and PIA client accounts, is rarely insufficient. However, in the unlikely event that there is an insufficient supply to satisfy the competing demands of ANH and PIA's clients, dual employees are required to attempt to mitigate such conflicts by determining whether the investment in question is more suitable for ANH or PIA clients based on their respective investment strategies and guidelines relating to acquisition of assets, leverage, liquidity and other factors that such dual employees determine to be appropriate. Dual employees may give advice and take action with respect to ANH's account that may differ from advice given or the timing or nature of action taken with respect to any PIA client account. PIA makes available copies of the latest annual report of ANH to all PIA clients upon written request. For more information on PIA's association with ANH see the *Other Financial Industry Activities and Affiliations* section of this brochure.

Ms. Baines devotes a portion of her time to ANH in capacities that could create conflicts of interest that may harm PIA's investment opportunities; this lack of a full-time commitment could also harm PIA's operating results. Although Ms. Baines is under no contractual obligation to devote any minimum amount of her time to PIA, she has defined roles and responsibilities that must be fulfilled.

Additional Compensation

Ms. Baines receives annual compensation for her role at Anworth Management, LLC.

Supervision

As Chairman of PIA, Ms. Baines is not directly supervised. However, she does report to the Board of Directors for overall supervision.

Joseph E. McAdams, CFA

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Additional information about Joseph E. McAdams is available on the SEC's website at www.adviserinfo.sec.gov.

Joseph E. McAdams, CFA

Education and Business Experience

Joseph E. McAdams was born in 1969. He joined PIA in 1998 and serves as a Managing Director. Mr. McAdams earned his Master's degree in Economics from the University of Chicago and his Bachelor's degree *magna cum laude* from The Wharton School of the University of Pennsylvania.

Professional Designations

Mr. McAdams received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Disciplinary Information

Joseph E. McAdams does not have disciplinary information to report.

Other Business Activities

Mr. McAdams currently serves as the President, Chief Investment Officer and Chief Executive Officer of Anworth Mortgage Asset Corporation (ANH), a NYSE-listed mortgage REIT that he has worked for since 1998. Since March 14, 2011, Mr. McAdams has served as a Member of Anworth Management, LLC.

Although PIA clients may own ANH securities in their portfolios, PIA does not recommend ANH securities and if owned in a PIA portfolio, PIA will not charge an investment management fee for any ANH security in the portfolio.

Both PIA and ANH invest in mortgage-backed securities ("MBS"). However, PIA believes that such ANH conflicts are mitigated in part by the fact that the MBS market is characterized by an abundance of available securities and the supply of MBS typically targeted by ANH and PIA client accounts, is rarely insufficient. However, in the unlikely event that there is an insufficient supply to satisfy the competing demands of ANH and PIA's clients, dual employees are required to attempt to mitigate such conflicts by determining whether the investment in question is more suitable for ANH or PIA clients based on their respective investment strategies and guidelines relating to acquisition of assets, leverage, liquidity and other factors that such dual employees determine to be appropriate. Dual employees may give advice and take action with respect to ANH's account that may differ from advice given or the timing or nature of action taken with respect to any PIA client account. PIA makes available copies of the latest annual report of ANH to all PIA clients upon written request. For more information on PIA's association with ANH see the *Other Financial Industry Activities and Affiliations* section of this brochure.

Mr. McAdams devotes a portion of his time to ANH in capacities that could create conflicts of interest that may harm PIA's investment opportunities; this lack of a full-time commitment could also harm PIA's operating results. Although Mr. McAdams is under no contractual obligation to devote any minimum amount of his time to PIA, he has defined roles and responsibilities that must be fulfilled.

Additional Compensation

Mr. McAdams receives annual compensation for his role at Anworth Management, LLC.

Supervision

Mr. McAdams reports to Lloyd McAdams formally at scheduled Board of Directors meetings, to the Management Group at management meetings and informally as required to discuss various business aspects of the position responsibilities.

Lloyd McAdams: (310) 255-4466

Daniel F. Meyer, CFA

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This brochure supplement provides information about Daniel F. Meyer that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel F. Meyer is available on the SEC's website at www.adviserinfo.sec.gov.

Daniel F. Meyer, CFA

Education and Business Experience

Daniel F. Meyer was born in 1971. Mr. Meyer joined PIA in 1999 and serves as a Managing Director and Senior Portfolio Manager. Mr. Meyer earned a Bachelor of Arts degree *cum laude* in Business Economics from the University of California at Santa Barbara.

Professional Designations

Mr. Meyer received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Disciplinary Information

Mr. Meyer does not have disciplinary information to report.

Other Business Activities

Mr. Meyer does not participate in other business activities.

Additional Compensation

Mr. Meyer does not receive additional compensation.

Supervision

Mr. Meyer reports to Lloyd McAdams formally at scheduled Board of Directors meetings, to the Management Group at management meetings and informally as required to discuss various business aspects of the position responsibilities.

Lloyd McAdams: (310) 255-4466

Bistra Pashamova, CFA

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This brochure supplement provides information about Bistra Pashamova that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Additional information about Bistra Pashamova is available on the SEC's website at www.adviserinfo.sec.gov.

Bistra Pashamova, CFA

Education and Business Experience

Bistra Pashamova, CFA was born in 1970. Ms. Pashamova joined PIA in 1997 and serves as Vice President, Portfolio Manager. Ms. Pashamova studied Economics and International Studies at Denison University, earning her Bachelor's Degree *cum laude*. She earned a Master's Degree in Economics from the University of Southern California.

Professional Designations

Ms. Pashamova received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Disciplinary Information

Ms. Pashamova does not have disciplinary information to report.

Other Business Activities

Since January 1, 2012, Ms. Pashamova has been an employee of Anworth Management, LLC.

Although PIA clients may own ANH securities in their portfolios, PIA does not recommend ANH securities and if owned in a PIA portfolio, PIA will not charge an investment management fee for any ANH security in the portfolio.

Both PIA and ANH invest in mortgage-backed securities ("MBS"). However, PIA believes that such ANH conflicts are mitigated in part by the fact that the MBS market is characterized by an abundance of available securities and the supply of MBS typically targeted by ANH and PIA client accounts, is rarely insufficient. However, in the unlikely event that there is an insufficient supply to satisfy the competing demands of ANH and PIA's clients, dual employees are required to attempt to mitigate such conflicts by determining whether the investment in question is more suitable for ANH or PIA clients based on their respective investment strategies and guidelines relating to acquisition of assets, leverage, liquidity and other factors that such dual employees determine to be appropriate. Dual employees may give advice and take action with respect to ANH's account that may differ from advice given or the timing or nature of action taken with respect to any PIA client account. PIA makes available copies of the latest annual report of ANH to all PIA clients upon written request. For more information on PIA's association with ANH see the *Other Financial Industry Activities and Affiliations* section of this brochure.

Ms. Pashamova devotes a portion of her time to ANH in capacities that could create conflicts of interest that may harm PIA's investment opportunities; this lack of a full-time commitment could also harm PIA's

operating results. Although Ms. Pashamova is under no contractual obligation to devote any minimum amount of her time to PIA, she has defined roles and responsibilities that must be fulfilled.

Additional Compensation

Ms. Pashamova receives annual compensation for her role at Anworth Management, LLC.

Supervision

Ms. Pashamova reports to Lloyd McAdams formally at scheduled management meetings and informally as required to discuss various business aspects of the position responsibilities.

Lloyd McAdams: (310) 255-4466

Hsin Tong, CFA

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This brochure supplement provides information about Hsin Tong that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Hsin Tong, CFA

Education and Business Experience

Hsin Tong, CFA was born in 1980. Ms. Tong joined PIA in 2005 and serves as Vice President, Portfolio Manager. Ms. Tong earned a Bachelor of Science degree in Mechanical and Electronics Engineering from Shantou University in China, and a Master of Science degree in Industrial and Systems Engineering from the University of Southern California.

Professional Designations

Ms. Tong received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charter holders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Disciplinary Information

Ms. Tong does not have disciplinary information to report.

Other Business Activities

Ms. Tong does not participate in other business activities.

Additional Compensation

Ms. Tong does not receive additional compensation.

Supervision

Ms. Tong reports to Dan Meyer formally at scheduled management meetings and informally as required to discuss various business aspects of the position responsibilities.

Dan Meyer: (310) 255-4420

Rory Hargaden, CFA

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This brochure supplement provides information about Rory Hargaden that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Additional information about Rory Hargaden is available on the SEC's website at www.adviserinfo.sec.gov.

Rory Hargaden, CFA

Education and Business Experience

Rory Hargaden, CFA was born in 1964. Mr. Hargaden joined PIA in February 1989 and serves as Vice President, Portfolio Manager and Credit Research Analyst. Prior to joining PIA, Mr. Hargaden served in the Audit and Tax Services divisions of Ernst & Whinney and KPMG Peat Marwick. Mr. Hargaden earned both his B.S. in Business Administration and M.B.A. from the University of Southern California.

Professional Designations

Mr. Hargaden received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over a minimum of two years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process, must become a member of CFA Institute and must commit to abide by, and annually reaffirm, adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Disciplinary Information

Mr. Hargaden does not have disciplinary information to report.

Additional Compensation

Mr. Hargaden does not receive additional compensation.

Other Business Activities

Mr. Hargaden does not participate in other business activities.

Supervision

Mr. Hargaden reports to Daniel Meyer formally at scheduled management meetings and informally as required to discuss various business aspects of the position responsibilities.

Daniel Meyer: (310) 255-4420

Michael Yean

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This brochure supplement provides information about Michael Yean that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Michael Yean

Education and Business Experience

Michael Yean was born in 1975. Mr. Yean joined PIA in 1998 and serves as a Vice President, Portfolio Manager and Credit Research Analyst. Prior to joining PIA Mr. Yean served in the Consulting Department of Merrill Lynch and the Investment Department of M.J. Segal & Company. Mr. Yean earned his Bachelor of Arts degree in Economics at University of California at Los Angeles.

Professional Designations

Mr. Yean does not hold any professional designations.

Disciplinary Information

Mr. Yean does not have disciplinary information to report.

Additional Compensation

Mr. Yean does not receive additional compensation.

Other Business Activities

Mr. Yean does not participate in other business activities.

Supervision

Mr. Yean reports to Daniel Meyer formally at scheduled management meetings and informally as required to discuss various business aspects of the position responsibilities.

Daniel Meyer: (310) 255-4420

Quinn R. Stills

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This brochure supplement provides information about Quinn R. Stills that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Additional information about Quinn R. Stills is available on the SEC's website at www.adviserinfo.sec.gov.

Quinn R. Stills

Education and Business Experience

Quinn R. Stills was born in 1962. Mr. Stills joined PIA in 2017 and serves as a Portfolio Manager. Mr. Stills earned his Bachelor of Arts from Vassar College, and his M.B.A. from the Stanford Graduate School of Business.

Professional Designations

Mr. Stills does not hold any professional designations.

Disciplinary Information

Mr. Stills does not have disciplinary information to report.

Other Business Activities

Quinn R. Stills is the founder, Chief Investment Officer and Investment Committee Chairman of Palisades Investment Partners, LLC, an asset management firm headquartered in Santa Monica, California. Palisades manages equities for sophisticated institutions including corporate, Taft-Hartley and public pension plans as well as foundations and endowments.

Mr. Stills devotes a portion of his time to Palisades Investment Partners in capacities that could create conflicts of interest that may harm PIA's investment opportunities; this lack of a full-time commitment could also harm PIA's operating results. Although Mr. Stills is under no contractual obligation to devote any minimum amount of his time to PIA, he has defined roles and responsibilities that must be fulfilled.

Additional Compensation

Mr. Stills receives annual compensation for his role at Palisades Investment Partners, LLC.

Supervision

Mr. Stills reports to Lloyd McAdams formally at scheduled management meetings and informally as required to discuss various business aspects of the position responsibilities.

Lloyd McAdams: (310) 255-4466

Brett Roth, CFA

Anworth Management, LLC

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This brochure supplement provides information about Brett Roth that supplements Pacific Income Advisers, Inc. ("PIA") brochure. You should have received a copy of that brochure. Please contact us at (310) 393-1424 if you did not receive PIA's brochure or if you have any questions about the contents of this supplement.

Additional information about Brett Roth is available on the SEC's website at www.adviserinfo.sec.gov.

Brett Roth, CFA

Education and Business Experience

Brett Roth was born in 1964. Mr. Roth has been with Anworth Management, LLC, a relying advisor of PIA and external manager of Anworth Mortgage Asset Corporation, since 2014 and serves as a Senior Vice President and Portfolio Manager. Mr. Roth has over twenty years of experience as an investment professional. Prior to joining Anworth, Mr. Roth held senior positions at Trust Company of the West (TCW), MFA and GreenPoint Financial. Mr. Roth earned his Bachelor of Business Administration degree in Accounting from Emory University and an M.B.A. from the Fuqua School of Business at Duke University.

Professional Designations

Mr. Roth received a Chartered Financial Analyst designation. The Chartered Financial Analyst (CFA) charter is a professional designation established in 1962 and awarded by the CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over a minimum of two years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed income analysis, alternative and derivative investments and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process, must become a member of CFA Institute and must commit to abide by, and annually reaffirm, adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct.

Disciplinary Information

Mr. Roth does not have disciplinary information to report.

Other Business Activities

Mr. Roth does not participate in other business activities.

Additional Compensation

Mr. Roth does not receive additional compensation.

Supervision

Mr. Roth reports to Joseph E. McAdams formally at scheduled meetings, and informally as required to discuss various business aspects of the position responsibilities.

Joseph E. McAdams: 310-255-4467