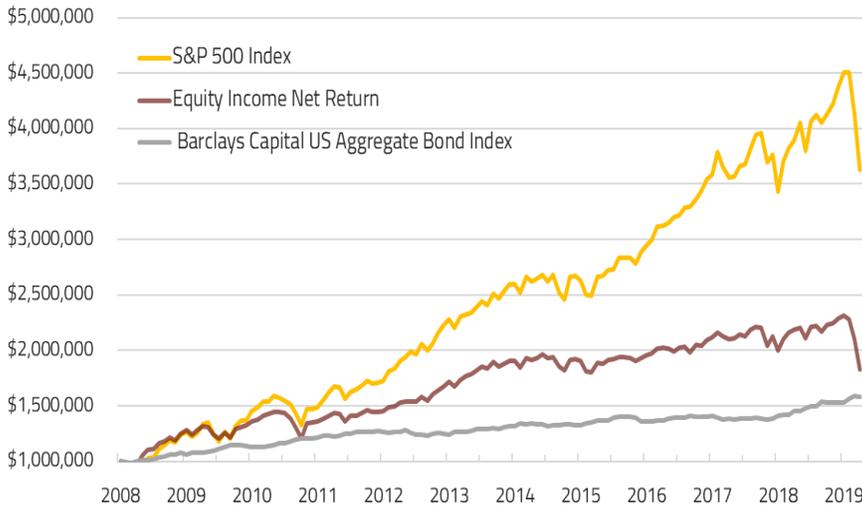
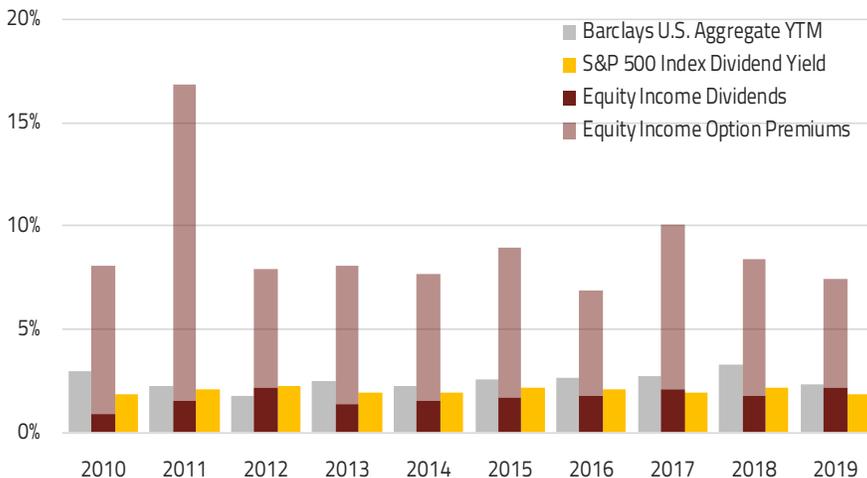


Performance of a \$1 Million Investment¹



Annual Cash Flow (as a percentage of composite value)¹



Portfolio Management Team



Barry Martin, CFA, Portfolio Manager

Barry Martin, CFA, joined the firm in 2008, Barry has been the Portfolio Manager for Shelton Capital Management's Option Overwrite Strategies. Prior to joining Shelton Capital, Barry was Senior Vice President of portfolio management for an investment management firm specializing in option strategies and has been managing options for over 20 years.



Nick Griebenow, CFA, Assistant Portfolio Manager

Nick Griebenow, CFA, joined the firm in 2018 and is the Assistant Portfolio Manager for Shelton Capital Management's Option Overwrite Strategies. Prior to joining Shelton Capital, Nick was a Senior Derivatives Trader for a large national brokerage firm.



Jason Goldenberg, Investment Operations Analyst

Jason Goldenberg joined Shelton Capital Management in 2017 and is an Investment Operations Analyst that services all strategies of the Separate Account program.

Strategy Objective

This strategy seeks to deliver capital appreciation and an enhanced level of income.

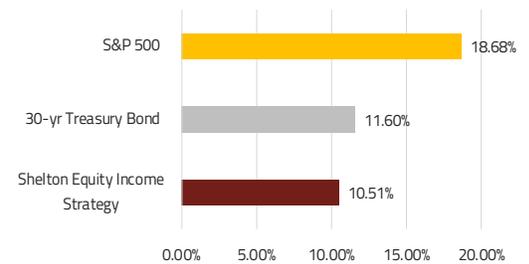
Strategic Overview

We seek to increase income and reduce overall volatility by building a portfolio of carefully selected US stocks and writing calls on the stocks held in the portfolio. This process is generally referred to as "selling covered calls."

Quick Facts

- Manager has over 20 years of options experience
- Benchmark - CBOE S&P BuyWrite Index
- Cash Flow Target - 5-7%, not including the portfolio's dividend yield
- Minimum Account - \$250,000

Benchmark Index Annualized Standard Deviation (December 2008 to December 2019)¹



Top Ten Composite Holdings

Holdings	Holdings
Verizon Communications Inc	4.70%
Abbott Laboratories	4.40%
Comcast Corp Cl A	4.00%
Nike Inc Cl B	3.90%
Akamai Technologies Inc	3.80%
Paychex Inc	3.60%
American Electric Power Inc	3.60%
Qualcomm Inc	3.50%
Medtronic PLC	3.50%
Paypal Holdings Inc	3.50%

Benefits

- The strategy may provide a means for which income oriented investors can diversify their income allocation while reducing direct exposure to interest rate risk.
- Access to the Portfolio Manager.
- Comprehensive reporting.
- Potentially reduce portfolio volatility.

Considerations and Risks

- A covered call strategy limits upside potential for stock appreciation and will therefore underperform in strong markets.
- A covered appreciation and will therefore underperform in strong markets.
- There are no assurances that we will be successful in reaching the investment objectives.
- A covered call does not protect a stock from downside risk. The loss for the investor could be the current price of the stock less the premium received for the call option.

Investment Process

500
Equities

We start with the S&P 500, a universe of widely held large-cap US stocks in the industrial, transportation, utility, and financial sectors which are selected by the S&P Index Committee, a team of analysts and economists at Standard & Poor's.

100
Equities

Applying fundamental analysis, stocks are ranked using third-party research, which include factors such as the 10-year trend of relative earnings and prices, recent earnings, price changes, and earnings surprises.

40-60
Equities

Using an additional proprietary fundamental screen, stocks are filtered by a variety of criteria, including free cash flow yield and price to sales ratios. The highest ranking equities are then selected in each of 11 sectors to closely replicate the sector weightings of the S&P 500 Index. The Portfolio Manager has a preference for largecap stocks with attractive dividend yields.

Approximately
30 Equities

Finally, we identify and purchase roughly 30 equities which we believe have the most overpriced call options. We strategically write (sell) those covered calls two to six times per year to generate income in addition to the portfolio's dividend yield.

Considerations and Risks Continued

- Withdrawals (such as systematic withdrawals as part of an income strategy) may result in a declining portfolio value over time.
- All investments involve risk including the possible loss of principal.

Frequently Asked Questions

Can clients transfer stocks they already own into Shelton Equity Income Strategy?

Yes, if Shelton Capital believes these stocks fit the objectives of the strategy and provide option writing opportunities, existing positions can be transferred to a strategy.

Can clients avoid purchases of individual stocks they don't want to own in Shelton Equity Income Strategy?

Yes. Some investors don't want to add further concentration of stocks they may already own elsewhere in their portfolios. Others prefer to avoid stocks that don't fit socially conscious or other criteria. We honor these requests.

What are the main risk factors in option overwrite strategies?

Compared to owning the underlying securities outright (without overlay), Covered Call Writing may limit upside potential for securities appreciation. If securities are called away, substantial capital gain tax could be incurred. Option overwrite strategies do not protect a security from downside risk. Investors could lose up to the full current price of underlying securities, less option premiums received.

What happens if one or more of the positions are "called away"?

The proceeds are reinvested into the appropriate replacement security as determined.

Composite Calendar Year Returns² - 10 Years

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020*
Shelton Equity Income Strategy - Gross	1.94%	9.46%	20.10%	12.89%	1.52%	4.40%	10.16%	-4.22%	17.54%	-20.75%
Shelton Equity Income Strategy - Net	-0.38%	7.25%	17.90%	11.03%	-0.08%	2.72%	8.27%	-5.74%	15.77%	-21.04%
CBOE S&P 500 Buy Write Index (BXM) Return ³	5.72%	5.20%	13.26%	5.64%	5.24%	7.07%	13.00%	-4.77%	15.68%	-22.22%

*Numbers presented for 2020 are through March 31, 2020. Performance numbers are not annualized.

IMPORTANT INFORMATION

Shelton Capital Management claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. Shelton Capital Management has been independently verified for the periods December 31, 2003 to December 31, 2017. The verification report(s) is/are available upon request. Verification assesses whether (1) the firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis and (2) the firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards. Verification does not ensure the accuracy of any specific composite presentation.

GIPS® is a registered trademark of CFA institute. CFA institute has not been involved in the preparation or review of this report/advertisement.

¹ Base Index data provided by Bloomberg.

² The performance numbers represent a composite consisting of all the firm's discretionary accounts that had a minimum balance of at least \$200,000, and were invested in the Equity Income Standard Out of the Money Strategy. Gross returns presented as supplemental information do not reflect the deduction of any management fees and do not reflect the deduction of all trading costs and are presented for comparison purposes only. Net returns are presented after all trading costs and actual management fees. Actual management fees may include other advisor investment management fees for accounts where Shelton Capital Management holds a sub-advisor relationship. Accounts in the composite pay a management fee based on percentage of assets under management. The management fee includes portfolio management, portfolio monitoring, reporting, and consulting services. The management fee schedule is as follows: 2.0% on accounts \$250k - \$500k, 1.50% on accounts greater than \$500k. Shelton Capital Management may accept accounts at fees other than those shown at its discretion. Dividends and Capital Gains are reinvested. The effects of income and capital gains taxes are not demonstrated. Cash flow returns are inclusive of net options premiums. The US Dollar is the currency used to express performance.

The CBOE S&P 500 Buy/Write Monthly Index (BXM) is a benchmark index designed to reflect the return on a portfolio that consists of a long position in the stocks in the S&P 500 index and a short position in an S&P 500 Index call option. It is a passive total return index based on selling the near-term S&P 500 Index call option against the S&P 500 stock index portfolio each month. The call written will have one month remaining to expiration, with an exercise price just above the prevailing index level (i.e., slightly out of the money). The call is held until expiration and cash settled, at which time a new one-month, near-the-money call is written. The index is provided to represent the investment environment existing during the time periods shown. Direct investments are not allowed into this index. The CBOE S&P 500 Buy/Write Monthly Index (BXM) performance information is provided by Advent.

Shelton Equity Income is a discretionary call writing investment service of Shelton Capital Management. This brochure is intended to describe generally how the Shelton Equity Income service works, but it is not a complete description of the strategy or how Shelton Capital Management performs its investment management responsibilities.

All analysis and projections depicted herein are for illustration only, and are not to be representations of generalized Shelton Equity Income performance or expected results. Past performance is not a guarantee of future results. Supporting documentation for any claims, comparisons, recommendations, statistics or other technical data will be furnished upon request to Shelton Capital Management.

The upside potential of fully written call option positions is limited to the strike plus the premium received. Unless the position is closed, the client relinquishes any upside potential above the call strike price. The downside protection afforded by call writing is limited to the amount of the premium received. If the stock held by the client declines significantly, the only protection will be the premium received.



For more information, visit www.sheltoncap.com

Clients subscribing to the Shelton Equity Income Portfolio service should be willing to sell all of the stock at the Strike Price. The Strike Price is the price at which a specific option contract can be exercised. The sale of stock will produce tax consequences for U.S. taxpayers. Each option transaction also produces a tax consequence. Prior to investing in a Shelton Equity Income Strategy strategy, you should discuss with your tax advisor how the option transactions and any sales of underlying stock will affect your tax situation. Shelton Capital Management does not provide tax advice.

Option trading is not suitable for all investors. Prior to buying or selling an option, a person must receive a copy of Characteristics and Risks of Standardized Options. Copies of this document may be obtained from your Investment Advisor, from any exchange on which options are traded or by contacting The Options Clearing Corporation, One North Wacker Dr., Suite 500, Chicago, IL 60606 (1-800-678-4667).