



I. INDEPENDENT SERVICE AUDITOR'S REPORT

To Management of Pickford Services Company:

We have examined the description in Section III titled "Description of Pickford Services Company's Escrow Services System for the Period August 1, 2017 to July 31, 2018" (description) based on the criteria set forth in paragraph 1.26 of the AICPA Guide Reporting on Controls at a Service Organization Relevant to Security, Availability, Processing Integrity, Confidentiality, or Privacy (SOC 2) (description criteria) and the suitability of the design and operating effectiveness of controls described therein to meet the criteria for the security principle set forth in TSP section 100, *Trust Services Principles and Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (AICPA, Trust Services Principles and Criteria)* (applicable trust services criteria), throughout the period August 1, 2017 to July 31, 2018. The description indicates that certain applicable trust services criteria specified in the description can be achieved only if complementary user entity controls contemplated in the design of Pickford Services Company's ("Pickford" or "Company") controls are suitably designed and operating effectively, along with related controls at the Company. We have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

The Company uses subservice organization Zayo Group, LLC for its system backup and disaster recovery. The description indicates that certain application trust services criteria can only be met if controls at the subservice organization is suitably designed and operating effectively. The description presents the Company's escrow services system; its controls relevant to the applicable trust services criteria; and the types of controls that the service organizations expect to be implemented, suitably designed, and operating effectively at the subservice organizations to meet certain applicable trust services criteria. The description does not include any of the controls implemented at the subservice organizations. Our examination did not extend to the services provided by the subservice organization, and we have not evaluated whether the controls management expects to be implemented at the subservice organization have been implemented or whether such controls were suitably designed and operating effectively throughout the period August 1, 2017 to July 31, 2018.

Service Organization's Responsibilities

In Section II titled "Management of Pickford Services Company's Assertion Regarding its Escrow Services System for the Period August 1, 2017 to July 31, 2018", (assertion) the Company has provided its assertion about the fairness of the presentation of the description based on the description criteria and suitability of the design and operating effectiveness of the controls described therein to meet the applicable trust services criteria. The Company is responsible for preparing the description and the assertion, including the completeness, accuracy, and method of presentation of the description and the assertion; providing the services covered by the description; identifying the risks that would prevent the applicable trust services criteria from being met; designing, implementing, and documenting the controls to meet the applicable trust services criteria; and specifying the controls that meet the applicable trust services criteria and stating them in the description.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the description based on the description criteria and on the suitability of the design and operating effectiveness of the controls described therein to meet the applicable trust services criteria, based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included procedures that we considered necessary in the circumstances. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether, in all material respects, the description is fairly presented based on the description criteria, and the controls were suitably designed and operating effectively to meet the applicable trust services criteria throughout the period August 1, 2017 to July 31, 2018.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of those controls involves:

- Evaluating and performing procedures to obtain evidence about whether the description is fairly presented based on the description criteria, and the controls were suitably designed and operating effectively, to meet the applicable trust services criteria throughout the period August 1, 2017 to July 31, 2018.
- Assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively.
- Testing the operating effectiveness of those controls to provide reasonable assurance that the applicable trust services criteria were met.
- Evaluating the overall presentation of the description, the suitability of the control objectives stated therein, and the suitability of the criteria specified by the service organization in its assertion.

We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Inherent Limitations

Because of their nature, controls at a service organization may not prevent, or detect and correct, all errors or omissions in providing services. Also, the projection to the future of any evaluation of the fairness of the presentation of the description or conclusions about the suitability of the design or operating effectiveness of the controls is subject to risks that the system may change or that controls at a service organization may become ineffective or fail.

Opinion

In our opinion, in all material respects, based on the description and the applicable trust services criteria

- a. The description fairly presents the escrow services system that was designed and implemented throughout the period August 1, 2017 to July 31, 2018.

- b. The controls stated in the description were suitably designed to provide reasonable assurance that the applicable trust services criteria would be met if the controls operated effectively throughout the period August 1, 2017 to July 31, 2018, and the subservice organizations and user entities applied the controls contemplated in the design of the Company's controls throughout the period August 1, 2017 to July 31, 2018.
- c. The controls operated effectively to provide reasonable assurance that the applicable trust services criteria were met throughout the period August 1, 2017 to July 31, 2018 if complementary subservice and user entity controls contemplated in the design of the Company's controls operated effectively throughout the period August 1, 2017 to July 31, 2018.

Description of Tests of Controls

The specific controls we tested, the tests we performed, and the results of our tests are presented in Section IV, "Trust Services Security Principle, Criteria, Related Controls, and Tests of Controls,".

Restricted Use

This report, including the description of tests of controls and results thereof in Section IV, are intended solely for the information and use of the Company; user entities of the Company's escrow services system during some or all of the period August 1, 2017 to July 31, 2018; and prospective user entities, independent auditors, practitioners providing services to such user entities, and regulators who have sufficient knowledge and understanding of the following:

- The nature of the services provided by the service organization.
- How the service organization's system interacts with user entities and other parties.
- Internal control and its limitations.
- The applicable trust services criteria.
- The risks that may threaten the achievement of the applicable trust services criteria and how controls address those risks.
- Complementary user entity controls and how they interact with related controls at the service organization to meet the applicable trust services criteria.

This report is not intended to be and should not be used by anyone other than these specified parties.

SQUAR MILNER LLP



Newport Beach, California
December 6, 2018