

**D.F. Dent and Co., Inc.  
Verification and Midcap Composite  
Performance Examination Report**

**December 31, 2023**





## Verification and Performance Examination Report

Principals of the Firm  
D.F. Dent and Co., Inc.

We have verified whether D.F. Dent and Co., Inc. (the “Firm”) has, for the periods from April 1, 2017 through December 31, 2023, established policies and procedures for complying with the Global Investment Performance Standards (GIPS®) related to composite and pooled fund maintenance and the calculation, presentation, and distribution of performance that are designed in compliance with the GIPS standards, as well as whether these policies and procedures have been implemented on a firm-wide basis. GIPS® is a registered trademark of CFA Institute. CFA Institute does not endorse or promote this organization, nor does it warrant the accuracy or quality of the content contained herein. We have also examined the Firm’s Midcap Composite for the periods from April 1, 2017 through December 31, 2023.

The Firm’s management is responsible for its claim of compliance with the GIPS standards, the design and implementation of its policies and procedures, and for the accompanying Midcap Composite’s GIPS composite report. Our responsibilities are to be independent from the Firm and to express an opinion based on our verification and performance examination. We conducted this verification and performance examination in accordance with the required verification and performance examination procedures of the GIPS standards, which includes testing performed on a sample basis. We also conducted such other procedures as we considered necessary in the circumstances.

In our opinion, for the periods from April 1, 2017 through December 31, 2023, the Firm’s policies and procedures for complying with the GIPS standards related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been, in all material respects:

- Designed in compliance with the GIPS standards, and
- Implemented on a firm-wide basis.



A verification covering the periods from July 1, 1994 through March 31, 2017 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

Also, in our opinion, the Firm has, in all material respects:

- Constructed the Midcap Composite and calculated the Midcap Composite's performance for the periods from April 1, 2017 through December 31, 2023 in compliance with the GIPS standards; and
- Prepared and presented the accompanying Midcap Composite's GIPS composite report for the periods from April 1, 2017 through December 31, 2023 in compliance with the GIPS standards.

A performance examination of the Firm's Midcap Composite covering the periods from January 1, 1999 through March 31, 2017 was performed by another verification firm, whose report expressed an unqualified opinion thereon.

This report does not relate to or provide assurance on any specific performance report of the Firm other than the Firm's accompanying Midcap Composite's GIPS composite report, or on the operating effectiveness of the Firm's controls or policies and procedures for complying with the GIPS standards.

*ACA Group*

ACA Group, Performance Services Division

April 17, 2024

## D.F. Dent & Company Inc.

### Midcap Composite GIPS Report

Year End	GIPS Assets (millions)	Advisory Only Assets (millions)*	Composite Assets		Annual Performance Results				Three-Year Annualized Standard Deviation	
			U.S. Dollars (millions)	Number of Accounts	Composite Gross*	Composite Net	Russell Midcap Growth	Composite Dispersion	Composite Gross	Benchmark
2023	8,146	1,462	1,414	86	24.01%	23.22%	25.87%	0.19%	20.43%	21.06%
2022	6,450	1,336	1,410	140	-29.88%	-30.34%	-26.72%	0.16%	23.14%	24.53%
2021	9,379	1,985	1,325	137	13.43%	12.71%	12.73%	0.23%	18.24%	20.19%
2020	8,147	1,528	1,876	113	32.00%	31.18%	35.59%	0.78%	19.68%	21.45%
2019	6,024	644	1,006	93	41.34%	40.47%	35.47%	0.17%	13.19%	13.88%
2018	4,458	66	440	65	0.62%	0.00%	-4.75%	0.30%	13.19%	12.82%
2017	4,442	17	507	60	32.39%	31.58%	25.27%	0.16%	11.79%	10.89%
2016	3,871	4	444	50	5.26%	4.59%	7.33%	0.20%	12.83%	12.18%
2015	3,900	N.A.	367	55	1.93%	1.26%	-0.20%	0.13%	12.37%	11.31%
2014	4,483	N.A.	339	22	3.79%	3.08%	11.90%	0.34%	11.37%	10.87%
2013	4,806	N.A.	256	17	44.47%	43.68%	35.74%	0.12%	15.20%	14.62%
2012	3,491	N.A.	36	12	19.81%	19.15%	15.81%	0.55%	18.00%	18.00%
2011	3,261	N.A.	21	8	6.23%	5.62%	-1.65%	0.16%	22.01%	20.82%
2010	3,194	N.A.	19	7	34.95%	34.16%	26.38%	N.A.1	N.A.	N.A.
2009	2,774	N.A.	15	Five or fewer	26.88%	26.11%	46.29%	N.A.1	N.A.	N.A.
2008	2,110	N.A.	9	Five or fewer	-36.51%	-36.88%	-44.32%	N.A.1	N.A.	N.A.
2007	3,334	N.A.	15	Five or fewer	30.47%	29.81%	11.43%	N.A.1	N.A.	N.A.
2006	2,627	N.A.	16	Five or fewer	13.00%	12.43%	10.66%	N.A.1	N.A.	N.A.
2005	2,251	N.A.	16	Five or fewer	19.74%	19.12%	12.10%	N.A.1	N.A.	N.A.

N.A.1 - Information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year.

\*For the time period from 3/31/2015 to 2/1/2021, this composite includes accounts which pay a wrap fee. The wrap fee covers costs such as commissions, management fees, and custodian fees. As of year-end 2015, these accounts made up less than 2% of the total composite assets. As of year-end 2016, these accounts made up 0% of the total composite assets. As of year-end 2017, year-end 2018, year-end 2019, year-end 2020 these accounts made up less than 1% of the total composite assets. As of year-end 2021, 2022, and 2023, these accounts made up 0% of the total composite assets. Gross performance for these accounts has not been reduced by transaction costs and is shown as supplemental information.

\*\*Advisory Only Assets are supplemental and represent UMA assets over which D.F. Dent does not have discretionary trading authority.

Time Period	Midcap Composite Annualized Returns (as of 12/31/2023)		
	Composite Gross	Composite Net	Benchmark Index
	One Year	24.01%	23.22%
Five Year	12.97%	12.26%	13.81%
Ten Year	10.56%	9.86%	10.57%

***Midcap Composite** contains fee paying taxable or tax-free equity accounts that focus on long term growth in equity securities of predominately mid cap companies (as defined by the Russell Midcap Index) with potential for growth and for comparison purposes is measured against the Russell Midcap Growth Index.*

D.F. Dent and Company, Inc. claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS standards. D.F. Dent and Company, Inc has been independently verified for the periods from July 1, 1994 through December 31, 2023. A firm that claims compliance with the GIPS standards must establish policies and procedures for complying with all the applicable requirements of the GIPS standards. Verification provides assurance on whether the firm's policies and procedures related to composite and pooled fund maintenance, as well as the calculation, presentation, and distribution of performance, have been designed in compliance with the GIPS standards and have been implemented on a firm-wide basis. The Midcap Composite has had a performance examination for the periods beginning January 1, 1999 through December 31, 2023. The verification and performance examination reports are available upon request

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D.F. Dent & Company, Inc. is an independently owned Baltimore based regulated investment firm, serving institutions and individuals since 1976. The firm's list of composite descriptions is available upon request. The firm's list of broad distribution pooled funds is available upon request.

Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Past performance is not indicative of future results. The U.S. Dollar is the currency used to express performance. Returns are presented gross and net of management fees and include the reinvestment of all income. Net of fee performance was calculated using actual management fees. Policies for valuating investments, calculating performance, and preparing GIPS reports are available upon request. Actual investment advisory fees incurred by clients may vary. Our standard fee schedule:

1% on the first \$10,000,000  
0.75 of 1% for \$10,000,001 to \$20,000,000  
0.50 of 1% over \$20,000,001

The annual composite dispersion presented is an asset-weighted standard deviation calculated for the accounts in the composite the entire year. The annual composite dispersion and three-year annualized standard deviation of the composite are calculated using gross-of-fees returns. The Midcap Composite's creation date is December 31, 2008. The Midcap Composite's inception date is January 1, 1999.

The minimum account size for this composite was \$100,000 for periods prior to 3/31/2015. For periods after 3/31/2015, there is no minimum account size.

D.F. Dent maintains a significant cash flow policy for this composite. Prior to June 30, 2020 accounts would typically not be removed from the composite for significant cash flows. Effective June 30, 2020, portfolios are removed from the composite if they have a significant cash flow which is defined as a contribution or withdrawal that is greater than 25% of the beginning market value of the portfolio.