MANAGED ACCOUNTS

ALL WEATHER

INVESTOR PROFILE

The All Weather portfolio is for investors nearing or in retirement who are concerned with the preservation of their capital, yet still desire income and growth.

METHODOLOGY

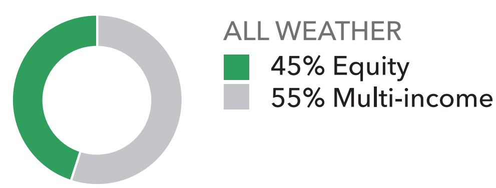
This managed model takes an income and growth investment approach, offering a multi-income diversified portfolio designed for retirees and near retirees.

We participate in equity and multi income markets and sectors, where the goal is income with growth potential. As with most Howard Capital Management, Inc. (HCM) models, this program has the ability to go up to 100% cash during a market downturn.

HIGHLIGHTS OF INVESTING IN THE
ALL WEATHER PORTFOLIO

1. Can go up to 100% cash or cash equivalent within its equity position to minimize loss in a market downturn
2. Objectively seeks lower volatility and consistent absolute return
3. Continuous monitoring seeks to assure that positions are not under-performing other possible alternatives
4. When better profit opportunities are identified, capital is re-deployed
5. The goal is to remove emotions from the process and execute the All Weather Retirement Program methodology objectively and mechanically

TARGET ALLOCATIONS*



COMPARATIVE BENCHMARK

S&P 500 Reinvested	HFRX Equity Hedge Index	Barclay Capital US Aggregate Bond TR Index
5%	40%	55%

AVAILABLE PLATFORMS

Pershing Advisor Solutions, LLC (PAS), TD Ameritrade (TDA), other platforms may be available

**The charts above represent an approximate percentage of investment choices for each model and should not be considered a guarantee or fixed percentage. May vary at manager's discretion.*

All investment approaches have the potential for loss as well as gain. There is no certainty that any investment or strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or successful in achieving investment objectives. Please work with your financial professional to determine which investment program is consistent with your financial objectives and risk tolerance.

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All Weather strategy trades mutual funds with an approximate target ratio of 45% Equity/55% Bond but may vary at manager's discretion. The HCM All Weather strategy typically seeks to participate in equity and multi income markets and sectors, where the goal is income with growth potential. The HCM All Weather strategy utilizes the HCM-BuyLine® proprietary indicator to monitor market conditions and assist in determining whether or not assets should be invested in equity products or moved to cash, cash equivalents, or bond funds. Multiple indicators are monitored in an effort to identify such trends in the equity markets. The strategy is rebalanced periodically, and it is possible for the allocation to be adjusted, including when the HCM-BuyLine® indicates a strengthening or weakening of the equity markets. Because this Howard Capital Management, Inc. (HCM) strategy is actively managed, it may experience above-average turnover, which could have a negative impact on account performance. To discourage short-term investing and excessive trading, mutual funds, including those utilized in the HCM All Weather, may impose short-term redemption fees that range from 0.50% to 2.00%. HCM seeks to avoid these fees, but they may occasionally be incurred.

Comparative Benchmark. S&P 500 Monthly Reinvested Index (45%), Barclays Capital US Aggregate Bond TR Index (55%). The index includes 500 leading companies in leading industries of the U.S. economy, capturing 75% coverage of U.S. equities. S&P 500 Reinvested assumes dividends are reinvested. Visit http://www.standardandpoors.com/indices for more information regarding Standard & Poor's indices. Barclays Capital US Aggregate Bond TR Index is a broad-based benchmark that measures the investment grade, US dollar-denominated, fixed-rate taxable bond market, including Treasuries, government-related and corporate securities, MBS (agency fixed-rate and hybrid ARM passthroughs), ABS, and CMBS. The US Aggregate rolls up into other Barclays Capital flagship indices such as the multi-currency Global Aggregate Index and the US Universal Index, which includes high yield and emerging markets debt. The US Aggregate Index was created in 1986, with index history backfilled to January 1, 1976. Total Return (TR) assumes yield is reinvested. Visit https://ecommerce.barcap.com/indices for more information regarding Barclays Capital indices. Indices are unmanaged investment measures and are not available for investment purposes.

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