



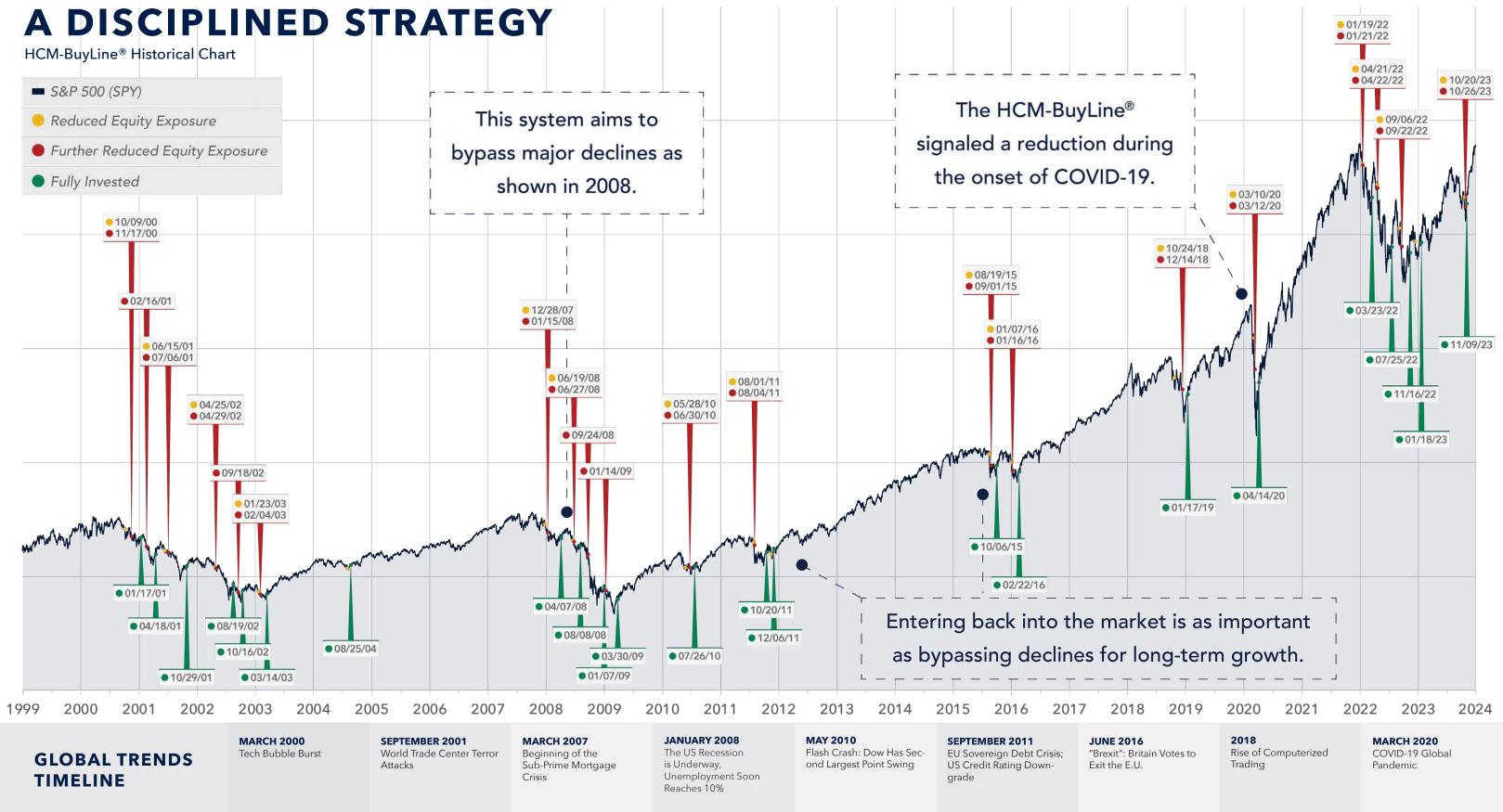
Howard Capital Management's (HCM) HCM-BuyLine® was developed by Vance Howard after the devastating financial losses of Black Monday in 1987. As a central feature of HCM's overall investment strategy, it is used to identify macro trends in global markets to determine appropriate portfolio positioning.

For decades, the HCM-BuyLine® has demonstrated the ability to capture long-term risk-adjusted returns through full market cycles.

KEY FEATURES

- Designed to be an emotionless and mathematically driven process
- Signals when to move to cash and/or lower risk investments during market declines
- Greater capital might be available to reinvest during market advances

There can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine®, market conditions, and delays in executing orders. It is not an actual stoploss order that automatically sells securities in the portfolio at a certain price. There can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine®, market conditions, and delays in executing orders. It is not an actual stoploss order that automatically sells securities in the portfolio at a certain price.



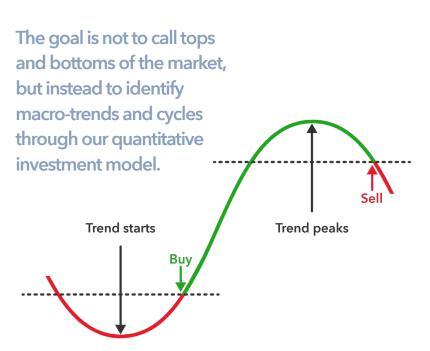
The Line indicated on this the S&P 500. Historical performance for the SPDR® S&P 500® ETF Trust (Symbol: SPY) is provided for informational and illustrative purposes only. SPY seeks to provide investment results that, before expenses, correspond generally to the price and yield performance of the S&P 500® Index, a diversified large cap U.S. index that holds companies across all eleven Global Industry Classification Standards sectors. SPY performance is shown net of internal fund expenses, including fund management fees and transaction costs. It should not be assumed that your account or any Howard CM strategy or model holdings correspond directly to SPY or any comparative benchmarks. The graphic above and on the right represents the dates on which the HCM-BuyLine® indicator signaled a change in market conditions. The graphic does not represent actual trading activity. The HCM-BuyLine® is an indicator only and will not automatically allocate and/or re-allocate client assets. Actual trading activity may take time to research and implement and, as a result, trading activity may lag behind the signals provided by the HCM-BuyLine® indicator will perform as anticipated or that following any signals provided by the HCM-BuyLine® indicator will perform as anticipated or that following any signals provided by the HCM-BuyLine® indicator will perform as anticipated and the tree can be no guarantee that the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts due to the limitations of the HCM-BuyLine® indicator will perform as anticipated. Stoploss protection will not necessarily limit your losses to the desired amounts du

THE HCM-BUYLINE®

Proprietary, quantitative indicator

The HCM-BuyLine® uses a proprietary quantitative investment model to determine when we should be in or out of the market. The HCM-BuyLine® uses trend analysis to help identify the broad trend in the equity market. When the trend is down, we reduce exposure to equities, and when the trend is up, we increase exposure to equities.

This non-emotional, mechanical, and repeatable system helps take the guesswork out of HCM investment decisions. Even though not every HCM-BuyLine® signal will result in a profitable trade, the HCM-BuyLine®'s ability to preserve capital using math in major market downturns while pursuing opportunities for growth provides HCM with the potential to outperform the market on a long-term basis. For example, a portfolio which suffers a 30% loss, takes a 43% gain to return to the previous portfolio value. When the impact of a major market downturn is reduced, the investor is left better situated compared to a buyand-hold strategy. However, avoiding market downturns is just the start of an effective risk management system. The manager also needs to know when to be invested in equities. Here again, the HCM-BuyLine® comes into play, signaling a potential uptrend.



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THE HCM-BUYLINE® IN ACTION 2008 Market Collapse ■ S&P 500 (SPY) Reduced Equity Exposure Further Reduced Equity Exposure Fully Invested 012/28/07 01/15/08 06/19/08 06/27/08 09/24/08 01/14/09 04/07/08 08/08/08 03/30/09 01/07/09 The HCM-BuyLine® aims to bypass the decline by signaling when to move to the safety of money markets and/or shortterm bonds. Highlighting the financial meltdown in 2008, the HCM-BuyLine® signaled to exit the stock market.





We practice active money management. We do not believe in buy and hold, nor do we favor asset allocation. We must be strategic and tactical to bring our best defense against a market that does not think or feel.

Vance HowardCEO & Portfolio Manager

Vance Howard specializes in identifying market trends based on his proprietary HCM-BuyLine[®], a strict investment discipline developed through years of research and experience.

His investment management abilities are utilized in many types of trading systems, with investments including mutual funds, exchange-traded funds, individual equities and cash equivalents.

"We do not believe in buy and hold, nor do we favor asset allocation", says Mr. Howard of his philosophy. "Rather, we use a combination of both strategic and tactical approaches. The market does not think or feel. It is what it is, which is why our modus operandi is active money management."

Howard Capital Management, Inc., a SEC registered investment advisory firm, provides fee-based investment management to individuals and institutions using the HCM-BuyLine® discipline.



There is no certainty that any investment or strategy will be profitable or successful in achieving investment objectives.

WE LOOK FORWARD TO SPEAKING WITH YOU.

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Howard Capital Management, Inc. ("Howard CM") is an SEC-registered investment advisor with its principal place of business in the State of Georgia. SEC registration does not constitute an endorsement of Howard CM by the SEC, nor does it indicate that Howard CM has arraigned a particular level of skill or ability. Howard CM only transacts business where it is properly registered or is otherwise exempt from registration. Howard CM offers its investment methodology through multiple programs that may invest in exchange traded funds, variable annuities, Bonds and Mutual Funds. 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.

The HCM- BuyLine® graph represents some of the dates on which our proprietary indicator, the HCM-BuyLine®, identified changes in the market trend. Buys and sells may or may not have occurred on the exact dates shown. These dates do not necessarily reflect transactions applied to every individual account. Also, certain products, custodians and portfolios may have a delay in execution. When the HCM-BuyLine® indicates a bull market, Howard CM then identifies the particular mutual funds, ETFs or individual stocks that we believe have the best return potentials in the current market from the universe of assets available in each given program and invests in them. When the HCM-BuyLine® indicates a bear market, Howard CM moves clients' investments to less risky alternatives. Howard CM's performance results: 1) are presented net of advisory fees of 2.2% paid monthly in arrears, 2) are net of transaction fees and commissions, 3) are not net of custodial fees, and 4) reflect the reinvestment of dividends and capital gains. Past performance is not a guarantee or a reliable indicator of future results. Therefore, no current or prospective client should assume that the future performance of any specific investment, investment strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or equal to past performance levels.

The actual performance of an individual client's portfolio may be lower or higher than the performance of the Howard CM portfolio strategy. The returns of the strategy in certain years were higher than the returns of its comparative benchmark index. These returns were the result of certain market factors and events that may not be replicated in the future. All investment strategies have the potential for profit or loss. Changes in investment strategies, contributions or withdrawals may materially alter the performance, strategy and results of a client's portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment will either be suitable or profitable for a client's investment portfolioHoward CM may involve an above-average turnover, which could have a negative impact upon the net after tax gain experienced by an individual client in a taxable account. Economic factors, market conditions, and investment strategies will affect the performance of any portfolio and there are no assurances that it will match or outperform any particular benchmark for measuring the performance of a portfolio.

Historical performance for the SPDR® S&P 500® ETF Trust (Symbol: SPY) is provided for informational and illustrative purposes only. SPY seeks to provide investment results that, before expenses, correspond generally to the price and yield performance of the S&P 500® Index, a diversified large cap U.S. index that holds companies across all eleven Global Industry Classification Standards sectors. SPY performance is shown net of internal fund expenses, including fund management fees and transaction costs. It should not be assumed that your account or any Howard CM strategy or model holdings correspond directly to SPY or any comparative benchmarks. LARL.BLB.MNR.1122.020624