HOWARD
Capital Management

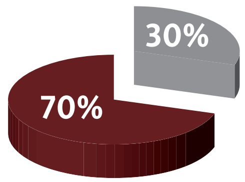
MANAGED ACCOUNTS
ALL WEATHER

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 is an income and growth investment approach designed for retirees and near retirees with a multi income diversified portfolio.

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

TARGET ALLOCATIONS*



ALL WEATHER
- 70% Multi Income Mutual Funds/ETFs
- 30% Equity Mutual Funds/ETFs

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.

COMPARATIVE BENCHMARK

Dow Jones US Conservative Index	Barclays Capital US Aggregate Bond TR Index
50%	50%

AVAILABLE CUSTODIANS
TD Ameritrade, Pershing (PAS), FolioFN, Envestnet, Mid Atlantic, Matrix

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

Important Disclosure: Howard Capital Management, Inc. (HCM) offers its investment methodology through multiple programs that may invest in exchange traded funds (ETFs), mutual funds and individual stocks. This service is available for a fee in addition to those costs associated with the underlying securities. Our standard annual management fee is 2.2% of assets under management, charged quarterly in advance.

An investor should carefully consider investment objectives, risks, charges and expense before investing in a mutual fund or ETF. This information and more complete information, including potential risks, is included in each product's prospectus, which can be obtained from your financial professional. Read the prospectus carefully before investing.

Mutual funds and ETFs are subject to risks similar to those of stocks. Investment returns will fluctuate and are subject to market volatility, so that an investor's shares when redeemed may be worth more or less than their original costs. There are unique potential risks associated with the specific asset classes that a mutual fund or ETF represents. Investments in smaller companies typically exhibit higher volatility. In addition to the normal risks associated with investing, narrowly focused investments typically exhibit higher volatility. Bonds and bond funds will usually decrease in value as interest rates rise. Commodities markets have historically been extremely volatile. Inverse funds should lose money when their benchmark indexes rise—a result that is opposite from traditional mutual funds or ETFs. Inverse funds also entail certain risks, including inverse correlation, leverage, market price variance and short sale risks. Investments in foreign investments generally incur greater risks than domestic investments. International investments may involve risk of capital loss from unfavorable fluctuation in currency values, from differences in generally accepted accounting principles or from economic or political instability in other nations. Emerging markets involve heightened risks related to the same factors as well as increased volatility and lower trading volume. You should carefully consider the risk, charges and expenses of an ETF prior to investing. This and other important information can be found in the product's prospectus.

The Standard & Poor's 500 Total Return Index (S&P500 TR) is a capitalization-weighted index of 500 stocks with dividends reinvested. The index is designed to measure performance of the broad domestic economy through changes in the aggregate market value of 500 stocks representing all major industries. The index is an unmanaged investment measure and is not available for investment purposes.

No current or prospective client should assume that the future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or equal to past performance levels. 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.

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 stop loss order that automatically sells securities in the portfolio at a certain price.

Asset allocation and diversification do not ensure or guarantee better performance and cannot eliminate the risk of investment losses.

Past performance is no guarantee of future results.

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