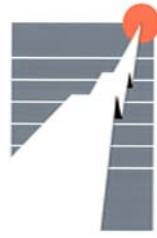


Clayton Chase Asset Management, LLC

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Regulatory Disclaimers

This document does not constitute an offer or solicitation of an offer to buy securities from the owners of the Company. The recipient is advised that this information may be subject to a Confidentiality Agreement. Where such an agreement is not already in effect, by accepting this document the recipient acknowledges and agrees that the information included herein is strictly proprietary and confidential, and accordingly may not be published, reproduced, copied or disclosed to any person other than employees of the recipient who are under the same non-disclosure obligation. This document represents management's best estimate of the future potential of the Company's business venture. It should be recognized that not all major risks can be accurately predicted or otherwise avoided. Therefore readers should be aware that this business has inherent risks that should be evaluated prior to any investment. Of course, past performance is no guarantee for future performance.



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Alternative Index Portfolios (AIP) is a hybrid equity index strategy that is a non-traditional alternative for index, long only, and the usual long-short institutional portfolio product.

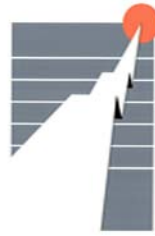
Problem: Equity Index performance is the average of every constituent component of an index, good, bad, or indifferent. Index investing continues to grow as a majority of equity portfolio managers continue to underperform their benchmarks. Regardless, indexing fails to actively manage downside risk and has virtually no prospect of outperforming a benchmark in any market environment.

Solution: Clayton Chase Asset Management, LLC (CCAM) has uniquely positioned Alternative Index Portfolios between traditional index investing and long-bias portfolio management. AIP will utilize the exact constituent components of the S&P 500 index universe in a managed account format. Applying the #1 ranked equity research has proven to produce significant Alpha for absolute returns without the use of derivatives to drive performance. Volatility is below index benchmark risk. Consequently, investors should view AIP as a meaningful upgrade that is a breakthrough solution for the poor performance that institutional index investing has historically experienced, while mitigating downside risk.

Story Line

AIP is predicated on the fact that within any universe of stocks, some will perform better than others in various market environments. The objective is the identification of specific chart patterns that are evident and predictable in performing better relative to others from both a top down and bottom up perspective. The collective actions of investors in the market place are reflected in chart patterns. It is this reliance on what investors are really doing that is imperative as opposed to any individual fundamental analysis or opinion. The timely analyses of these patterns provide opportunities to forecast impending changes in supply and demand conditions and the subsequent directional price movements. The goal of the AIP strategy is to identify those charts that are timely and significant. The methodology and process inherent in the strategy provides consistent, certified, and proven out performance of index investing.

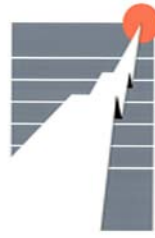
The expertise and experience of CCAM's chief analyst and founder, James Hopkins, are the principal reasons the firm's certified research has been top ranked for the five year period among all major firms. The AIP strategy offers a separate portfolio of equivalent index component stocks in order to take full advantage of better portfolio construction, risk control and trading techniques that position accounts to deliver returns that outperform benchmarks consistently over the long term.



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CCAM: Overview

- Country of Domicile: US, Illinois registration pursuant to SEC regulatory filings.
- Separately managed accounts, full transparency.
- Custodianship, clearing, reporting, back office operations outsourced to independent third party industry sources.
- Lock-up period: None.
- Liquid U.S. listed equities.
- Directional, long only or long-biased.
- Style: Technical.
- Execution: Blend-systematic/discretionary.

Company Registration Status

Clayton Chase Asset Management, LLC (CCAM)
FINRA CRD firm ID# 140344
FEIN # 27-0702085

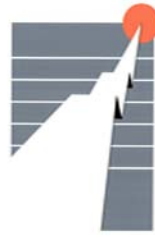
Mission Statement: Systematic pursuit for alpha while mitigating benchmark index risk.

The foundation of the AIP strategy is premised upon the success of the existing research company, When2Trade (now CCAM), which has been producing institutional equity research since 1999. The research methodology and stock selection process has been proven with a five year certified track record that averages 29.1% per year over the five year period in a universe covering 1646 equities. This places When2Trade #1 in performance among 42 major research firms including Goldman Sachs, Morgan Stanley, Merrill Lynch, Standard & Poor's, RBS, UBS, Oppenheimer, et al. When2Trade has been listed as a top 10 research firm in the Institutional Investor magazine. It was also named the most accurate in determining direction of stock prices among 121 research firms by Integrity Research. Over 150 institutions and hedge funds have paid for When2Trade portfolio research services. Industry relationships include contracts to provide research on Goldman Sachs institutional research platform, Reuters, Multex, Bloomberg, Soleil, Bridge, Mindset, Bank of New York's Jaywalk platform, First Call, etc. Over the years the firm has been interviewed by 73 business journalists and media outlets, including CNBC and Money Magazine.

Twenty years have been spent developing the AIP proprietary investment process that has proven timely and significant in any market environment. Front and back office operations, trading desk support and reporting are provided through the New York office of Saratoga Capital's Prime Services Group, an institutional prime broker with execution and custodial service relationships with Goldman Sachs Execution & Clearing (GSEC) and JP Morgan Chase (JPM). Accounts are held on a fully disclosed basis in segregated accounts with access to GSEC and JPM.

Exceptional certified long term performance:

- 5 year average (2002-7) per year results:
 - 24.7 % S&P 500,
 - 29.1 % 1646 stock universe,
 - 35.6 % Russell 2000 (partial coverage).



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- #1 ranking among 42 major research firms for 5 year period (2002-7).
- #1 ranking among 121 research firms for accuracy determining stock direction.
- 13 % per quarter average return on \$100 million long/short portfolio.
- 27.1 % average per year in 5 year S&P 100 portfolio long/short.
- 16.6 % average per year in 10 year S&P 500 portfolio long only (back test).
- Significant Alpha.
- Selective Beta capture.
- Below benchmark Volatility.
- Positive Sharpe Ratio.
- Bell shaped Kurtosis with positive fat tail.
- Exceptional past returns certified, verified, and tested.

Among the array of alternatives to index investing in the market place, CCAM stands apart as an intelligent, rational approach to equity portfolio management.

Product Summary

AIP is a hybrid long biased equity strategy that is a non-traditional alternative for the usual index, long only, and long-short institutional portfolio product. It can also opportunistically short liquid publicly traded equities, if mandated. This is a systematic, discretionary discipline that has proven to produce significant alpha for absolute return without the use of derivatives to drive performance. This technically based strategy is capable of accommodating large institutional allocations.

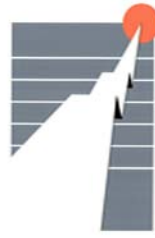
- Unique proprietary trading methodology and process proven in all market conditions.
- Superior long bias and long only comps to benchmark with lower volatility.
- Strategy does not allow positions to be held if support is broken, seeking to avoid major losses.

Index Fund Alternative

Overview: Changing Value Proposition

Equity indices were never created to be investments. Dow Jones, Standard & Poor's, Russell, Wilshire, Morgan Stanley Capital International (MSCI), Goldman Sachs, et al, created indexes as a way to explain an economy or measure a sub-set of an economy.

Over time, indices grew in popularity as a means of benchmarking portfolio manager performance. Unfortunately, most investment managers have not been able to outperform these benchmarks consistently. Consequently, institutional investors began to demand that the street produce product that would allow them to at least perform in-line with the indices by creating derivatives, index mutual funds and more recently Exchange Traded Index Funds (ETF's). Nevertheless, traditional index values continue to reflect an average of all the constituent components of the index and are primarily dependent upon the general direction of the broader market averages. Passive index investment vehicles represent an average with obvious under performing stocks included. The AIP (CCAM) approach to trading has proven to consistently outperform traditional benchmark indexes, regardless of the performance of individual components or the overall market direction.



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Concept

- Innovative investment approach: Equally weighted transitioning to exponentially weighted positioning of index constituents, actively monitored, utilizing the exact constituent component stocks within the index.
- Buy stocks which are rising and avoid stocks that potentially impact performance negatively. Methodology does not allow positions to be held, for example, if relative support is broken and thus seeks to avoid major losses and mitigate risk. Support and resistance levels are determined by the AIP proprietary methodology and positions actively monitored.
- No leverage or derivatives are utilized. Index derivatives, however, can be utilized as a replacement for cash if the client requires 100% invested policy.

Index universes available:

- S&P 500. Solutions for sector allocation mandates are available by “drill-down” into constituent components of sector universe. Customized universes available include the Dow Jones 30, S&P 100, and NASDAQ100. Viable size and scale potential for each portfolio.

CCAM: Client Accounts

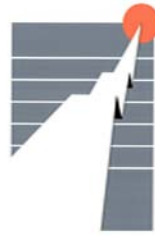
- Separately managed accounts.
- Full transparency and custody through client choice of prime broker.
- Investor has daily access to account and portfolio data.
- Investments are publicly traded equities only.
- Portfolios are readily marked to market.
- No illiquid investments considered in portfolios.
- Each client has their own cost basis established and private tax lot for each security.

AIP Investment Philosophy

The investment philosophy is predicated on the fact that within any universe of stocks, some will perform better than others in various market environments. The strategy objective is the identification of specific chart patterns that are evident and predictable in performing better, relative to others from a technical top-down and bottom-up perspective. It is this reliance on what investors are really doing that is imperative as opposed to any individual analysis or opinion, whether fundamental or quantitative. The collective actions of investors in the market place become apparent in the charts and provide indications of impending price change in supply and demand conditions and the resulting price movements. The goal is to select those charts that are timely and significant.

Competitive advantage

The main competitive advantage is proven out-performance while mitigating risk. The proprietary methodology delivers consistent performance with significant alpha and selective beta capture. The AIP advantage is in actively managing the investment portfolio while maintaining focus on the universe of stocks within the targeted index. Historically, the problem for institutions is that index returns are subjected to the performance of the market, including a melt down of markets as experienced in 2008. Indexing fails to actively manage downside market risk and will not outperform the benchmark in any market direction. CCAM's research style and portfolio management is not confined to a single



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methodology and maintains flexibility to apply the appropriate technical tools that determine relative performance. The methodology, system, and process allow market behavior to be interpreted in the universe and the market in aggregate. Reaction to the signal that support has been violated, for example, requires attention, analysis, and action. The timely, systematic identification of buying opportunities provides significant alpha and captures beta by being properly positioned over meaningful periods of time.

Time is relevant and timing is important. Time in an investment is not the major consideration for investment as it is less important than direction and positive performance. An exception is the example of a stock chart that is basing and requires too much time to develop. Consider, on the other hand, the persistence of a long channel. Time in an investment is dictated by the actions of the market. Whether days, months, or years, an investment is only as good as it is currently and relevant to its performance. Changes drive the process. Take what the market gives you, whether alpha or beta. This dynamic approach to index investing is a hallmark of the AIP methodology.

In summary, improved timing combined with the ability to determine price direction is significant.

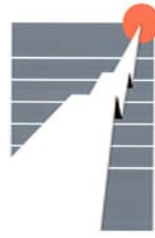
The actions of the market drive the research process. The system methodology determines the analysis and the decision for action. Theoretically the portfolio composition could evolve on a case by case basis to zero positions or 100% invested. AIP is not an index, but an alternative index strategy whereby all of the index component parts are actively managed. Based on realistic estimates for the S&P500 there are 20-40 core positions, 40-80 positions with long term prospects, 120-280 positions indicating directional conviction, and 20-40 stocks moving counter to prevailing market direction. The initial investment allocation is equally weighted among the constituent components of the index universe. After positioning, each stock performs on its own merit thus transitioning the portfolio to an exponential allocation. **CCAM has uniquely positioned AIP between enhanced indexing and long bias portfolio management.** The strategy was developed for large institutional core portfolios and as such, is repeatable. The AIP methodology and process provides certified, and proven out performance consistently versus benchmark indices.

Discussion of comparative analytical methods:

Traditionally, there are three categories of research and analysis in investing; fundamental, quantitative, and technical.

I- Fundamental analysis dominates the financial money management industry and related academic focus. What's the top line, bottom line, competition, management, macro economics, accounting, etc? Simply, what's the story? However, this approach is subject to a random tabular element in approach and requires significant investment in time and resources with limited results that are narrowly defined to the subject under study, not to mention subjective and at best incomplete. It is reliant upon the management as the ultimate source of information about their own company. Thematic fundamental analysis has an inescapable element of hit and miss.

II- Quantitative analysis is very linear and can cover a larger universe with the power of computers, but is only objective and dependent upon various sources for empirical input. Most algorithms only work



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some of the time which means other times they are not working. Each different market condition requires the use of different indicators. Success depends on the quant driver's ability to adapt to different market environments and apply the output correctly. The usual error in these systems is lack of adaptability to changing conditions.

III- Technical analysis requires the skilled evaluation of charts. It is admittedly an art within a science and dependent upon the ability and wisdom of each individual technical analyst. What works for one may not necessarily work for another. Each analyst must explore the possible combinations of patterns and filters for their own comprehension and approach for success. The inference of technical analysis is that collective actions of investors in the market place become apparent in the charts to provide indications of impending supply and demand conditions and the resulting price movements. The picture of a chart encompasses the sum total of all information reflected in investors' willingness to commit real investment resources. The broader implications are in understanding cycles, where in the cycle, strength, momentum, and timing. It is this ability to accurately interpret the information available in the squiggly lines that gives true advantage in the market place. The art is knowing which indicators to use, what entry signals to look for, how to determine the correct trading style that will improve yield and potential gain for the period of time once in the position. The ability to remain flexible in any market condition is inherent in the AIP strategy.

The AIP methodology, process, and system took years to develop. The result is a meaningful upgrade that is a breakthrough solution to redefine traditional business practices of institutional index investing. The strategy offers a viable solution for the poor performance that institutional index investing experiences while mitigating risk.

Investment Strategy

Traditional indexing is an average of all the constituent components of the index universe, good and bad. In aggregate, index investment strategy is reliant upon the general performance of the market and index without the possibility of outperformance in either direction of the market. Instead of buying the S&P 500 index and every constituent component within the index, AIP selectively establishes long positions within the same universe with a strategy utilizing only those stocks determined by proprietary research and discretionary analysis to have a chart demonstrating the likelihood for price appreciation and avoid individual stocks that will perform negatively. Resources allocated to each individual stock with a neutral or sell rating designation (as differentiated from shorting) are held as cash, or if preferred, in the appropriate index derivative or ETF. Each individual component of the index has a starting allocation and performs on its own merit. Portfolio construction does not utilize reallocation or rebalancing. The portfolio transitions to an exponentially weighted portfolio of performing stocks.

The AIP Investment Process:

- 1) Systematically analyze markets, indices and sectors (top down).
- 2) Breakdown index universe into constituent components.
- 3) Systematically analyze constituent components.
- 4) Assign relevant and significant price support/resistance for short, intermediate, and long term time frames.



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- 5) Each stock and index is "bracketed". System alerts are positioned and bring attention to price changes that reach key support and resistance levels for all stocks in the portfolio, benchmark universe, and index universe.
- 6) Analyze signals evident in the chart patterns that are dominant and inherently proven reliable.
- 7) Repeatable and proven: Variables accounted for and dominant pattern and/or affective patterns are determined to be timely and significant in relation to effective combinations of proprietary parameters.

Changes drive the process. If the market or sectors are moving, the system forces the discipline by drawing attention to individual equities requiring action. If the signals conform to technical rules and are determined to demonstrate reasonable risk/return potential, then take action and monitor price behavior at the next price contact at support/resistance and re-evaluate. The myriad of variations in charts notwithstanding, the methodology and process of the system are applied every day (repeatable). Not all stocks behave as anticipated regardless of the investment approach. Many positions are exited within 50 days. Consistent performance requires adaptation to changing situations by reacting to the oscillation of price changes when necessary, regardless of opinions and perceived value, time, or momentum. It is the collective action of individual stocks performing on their own merit. The determination of relative performance for each stock is key to the repeatable and consistent out performance by adjusting to changing chart data. Statistics cited in the long term analysis substantiate 885 bps over the S&P 100 and 1121 bps of Alpha over the S&P500 index with significant reduction of Standard Deviation below the benchmark risk (see page 22, *Metrics (Peer Group Comparison)*). The process of the AIP strategy evaluates, adapts, adjusts, and acts repeatedly, continuously, and consistently.

Portfolio Management is the primary focus and is a core function of the process within the research methodology. The system developed establishes three primary support and resistance levels in the monitoring system that automatically pulls up any violation of established parameter levels and is required to be analyzed on a daily basis. Long positions are liquidated for any stocks determined to violate important support established through the research process, and if applicable, any shorts violating resistance.

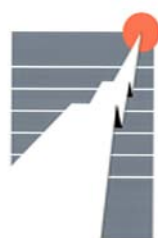
Risk Mitigation is accomplished within additional policies and guidelines. Investment guidelines are technically based and applied in real terms within the system. Three significant support and resistance points for the short, intermediate, and long term for each individual stock component of the entire universe are determined and entered into system. Additionally, a short, intermediate, and long term rating is assigned for each stock and continually updated as price contacts the support and resistance established. Daily, each stock that violates parameters is highlighted on a report generated by the system and is required to be analyzed. Once in position, a stock is held until updated alert is triggered, analyzed, and determined to require action due to violation of significant support or is determined to have increased risk relative to available potential and momentum.

Sample Daily Changes:

| | | | | | | | | | | | | | | |
|----------------------------------|--------|---|-----------------------|----------------|--------|------|------------|-----|-------|-----------------------------|---------|------|-------|----|
| James H. Hopkins 618-655-9800 | | | Trend Changes Summary | | | | | | | Tim Bestler 312-258-3100 | | | | |
| Done Load Save | | | Sort | | | | | | | | | | | |
| Portfolio | | | Tactical | Strategic View | | | Resistance | | | | Support | | | |
| Interests | Ticker | | Summary | Short | Inter. | Long | 3 | 2 | 1 | Price | 1 | 2 | 3 | |
| | AMCC | | 2 | 2 | 2.5 | 2.5 | 2 | 8 | 6.5 | 5.5 | 4.30 | 4 | 3.5 | 3 |
| | GM | ^ | 2 | 2 | 2.5 | 2 | 2 | 53 | 50-48 | 43 | 40.59 | 39 | 38 | 37 |
| | JNY | | 2 | 2 | 2 | 2.5 | 3 | 47 | 43 | 40 | 37.23 | 35.5 | 34.5 | 33 |
| | JBL | v | 3 | | 3.5 | 3 | 2 | 34 | 32 | 27 | 24.98 | 23 | 22 | 19 |
| | SYMC | ^ | 3 | 3 | 2.5 | 3 | 3.5 | 34 | 30 | 29 | 26.18 | 25 | 23.5 | 20 |
| | AMD | v | 4 | 4 | 3.5 | 3 | 2.5 | 30 | 25 | 23 | 21.38 | 20 | 18 | 16 |
| | APC | v | 4 | 4 | 3.5 | 3.5 | 2.5 | 67 | 66 | 64 | 62.25 | 60.5 | 58 | 56 |
| | DLX | v | 4 | 4 | 3.5 | 3 | 2.5 | 42 | 39 | 38 | 37.10 | 36 | 34 | 26 |
| | EQR | v | 4 | 4 | 4 | 4 | 3 | 40 | 37 | 36.5 | 35.48 | 35 | 34 | 33 |
| | GD | v | 4 | 4 | 4 | 3 | 3 | 110 | 107 | 104 | 102.00 | 99 | 94 | 86 |
| | IR | v | 4 | 4 | 4 | 3 | 3 | 90 | 88 | 83 | 79.47 | 78 | 75-72 | 70 |
| | LLL | | 4 | 4 | 3.5 | 3 | 3 | 84 | 77 | 74 | 71.20 | 70 | 66 | 62 |
| | NEM | v | 4 | 4 | 4 | 3.5 | 3 | 50 | 46 | 44 | 42.84 | 41 | 36 | 35 |
| | VLO | v | 4 | 4 | 4 | 4 | 4 | 50 | 48 | 46 | 43.67 | 40 | 37 | 32 |
| | EOG | v | 5 | 5 | 5 | 4 | 4 | 77 | 72 | 69 | 67.23 | 64 | 60 | 55 |

Sample spreadsheet of daily output for entire universe:

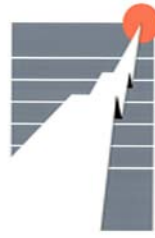
| James H. Hopkins 618-655-9800 | | | | | | | | | Tim Bestler 630-321-9975 | | | Type sector name here ----> | |
|----------------------------------|--------|-----------|---------------|--------|------|------------|------|------|-----------------------------|---------|-------|-----------------------------|--------------------------------|
| Done Load Save | | | | | | | | | | | | | |
| Portfolio | Ticker | Strategic | Tactical View | | | Resistance | | | Price | Support | | | Company |
| Interests | | Summary | Short | Inter. | Long | 3 | 2 | 1 | | 1 | 2 | 3 | Name |
| | A | 2 | 2 | 2.5 | 2 | 39-35 | 30 | 26 | 23.91 | 22.5 | 21.5 | 20 | Agilent Technologies Inc. |
| | AA | 2 | 2.5 | 2.5 | 2.5 | 43 | 39 | 35 | 32.01 | 29.5 | 28 | 26 | Alcoa Inc. |
| | AAPL | 3 | 3 | 3.5 | 4 | 100 | 92 | 91 | 44.67 | 85 | 76-74 | 70 | Apple Computer Inc. |
| | ABC | 2 | 2.5 | 2.5 | 2.5 | 72 | 68 | 64 | 59.89 | 59 | 57 | 56 | AmerisourceBergen Corp. |
| | ABI | 2 | 2.5 | 2 | 2 | 25 | 24 | 22 | 20.48 | 19 | 18 | 17 | Applied Biosystems Group |
| | ABK | 4 | 4 | 3 | 3 | 91 | 85 | 80 | 78 | 75 | 72 | 70 | Ambac Financial Group Inc. |
| | ABS | 2 | 3 | 3 | 2 | 28-27 | 26 | 24 | 22.01 | 22 | 20 | 17 | Albertson's Inc. |
| | ABT | 2 | 3.5 | 3 | 2.5 | 57 | 53 | 48 | 45.97 | 45 | 43 | 41 | Abbott Laboratories |
| | ACE | 2 | 2 | 2.5 | 2 | 60 | 55 | 53 | 44.44 | 44 | 42 | 41 | ACE Limited |
| | ACS | 3 | 3 | 3 | 2.5 | 64 | 61 | 57 | 50.61 | 49 | 46 | 43 | Affiliated Computer Services |
| | ACV | 3 | 3 | 3 | 4 | 58 | 56.5 | 53 | 52.22 | 51 | 50 | 48 | Alberto-Culver Company |
| | ADBE | 2 | 3 | 3 | 2.5 | 67 | 65 | 64 | 62.05 | 60 | 58 | 54 | Adobe Systems Incorporated |
| | ADCT | 2 | 3 | 2.5 | 2 | 3.6 | 3.1 | 2.85 | 2.38 | 2.35 | 2.2 | 1.75 | ADC Telecommunications |
| | ADI | 2 | 2.5 | 2 | 2.5 | 53-50 | 42 | 40 | 37.32 | 36 | 34 | 29 | Analog Devices Inc. |
| | ADM | | 3 | 3.5 | 3.5 | 28 | 25 | 24.5 | 24.14 | 22.5 | 21 | 19-18 | Archer Daniels Midland Company |
| | ADP | 2 | 3.5 | 3 | 2.5 | 47 | 45 | 44 | 42.76 | 41 | 40 | 38.5 | Automatic Data Processing |
| | ADSK | 5 | 3 | 3 | 3.5 | 40 | 39 | 32 | 29.91 | 28 | 26-24 | 22-18 | Autodesk Inc. |
| | AEE | 2 | 2 | 2.5 | 2 | 60 | 56 | 53 | 51.5 | 50 | 48 | 47 | Ameren Corporation |
| | AEP | 3 | 3 | 3 | 2.5 | 40-39 | 36 | 33.5 | 33.61 | 31.5 | 30.5 | 28.5 | American Electric Power |
| | AES | 2 | 2.5 | 3 | 2 | 30 | 20 | 18 | 16.62 | 16 | 15 | 14 | The AES Corporation |



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Sample spreadsheet of top down index analysis:

| | | Strategic Summary Report | | | | | | | | Indices | | | | | |
|---------------------|---------|--------------------------|---------------|--------|------|------------|-----------|-------|---------|---------|-------|-----------|-----------------------|----------------------------|--|
| | | | | | | | | | | | | | | | |
| Portfolio Interests | Ticker | Strategic Summary | Tactical Term | | | Resistance | | | Price | Support | | | Index Name | | |
| | | | Short | Inter. | Long | 3 | 2 | 1 | | 1 | 2 | 3 | | | |
| | \$BANK | 4 | 4 | 3.5 | 3 | 3240 | 3140 | 3100 | 3063.41 | 2965 | 2950 | 2905 | BANK NASDAQ | | |
| | \$BIX | 4 | 4 | 4 | 3 | 382 | 375 | 371 | 368.23 | 357 | 350 | 343 | Bank S&P | | |
| | \$BKX | 3 | 3.5 | 3 | 3 | 116 | 105 | 102.5 | 100.74 | 98 | 95 | 93-90 | Bank Philadelphia | | |
| | \$BTK | 3 | 3.5 | 3 | 2.5 | 570 | 550 | 535 | 521.82 | 512 | 480 | 445 | Biotech AMEX | | |
| | \$CEX | 3 | 3 | 3 | 2.5 | 242 | 235 | 230 | 227.61 | 220 | 210 | 204 | S&P CHEMICAL | | |
| | \$CKG | 3 | 3 | 3 | 3.5 | 236 | 218 | 213 | 212.84 | 205 | 197 | 192 | Growth | | |
| | \$CMR | | 2.5 | 2.5 | 3 | 660 | 630 | 600 | 582.86 | 575 | 560 | 555 | Consumer | | |
| | \$COMPQ | 3 | 3.5 | 3 | 2.5 | 2195 | 2110 | 2070 | 2058.24 | 1970 | 1900 | 1850 | Nasdaq Composite | | |
| | \$CVK | 2 | 2.5 | 2.5 | 3 | 255 | 250 | 245 | 234.27 | 222 | 215 | 212 | Value | | |
| | \$CYC | 3.5 | 4 | 3 | 3 | 875 | 790 | 770 | 750.99 | 740 | 720 | 700 | | | |
| | \$DFX | 3 | 3 | 2.5 | 3 | 305 | 261 | 260 | 250.96 | 235 | 230 | 220 | Philly Defense | | |
| | \$DJR | 4 | 4 | 4 | 3.5 | 242 | 230 | 220 | 207.64 | 205 | 200 | 195 | REIT | | |
| | \$DRG | 3 | 3 | 3 | 2.5 | 320 | 316 | 310 | 300.82 | 300 | 290 | 283 | Pharmaceutical AMEX | | |
| | \$GHA | 3 | 4 | 3 | 2.5 | 340 | 325-320 | 308 | 301.49 | 292 | 270 | 260 | Computer Hardware | | |
| | \$GOX | 4 | 3.5 | 3.5 | 3 | 92 | 90 | 86 | 81.63 | 75 | 72 | 66 | CBOE Gold | | |
| | \$GSM | 4 | 4 | 3 | 2.5 | 228 | 220 | 210 | 201.47 | 190 | 176 | 162 | semiconductor Goldman | | |
| | \$GSV | 4 | 4 | 4 | 3 | 141 | 138 | 135 | 132.24 | 130 | 124 | 117 | Computer Service | | |
| | \$HCX | 3 | 3 | 3 | 3 | 353 | 345 | 343 | 339.51 | 337 | 327 | 310 | S&P Healthcare | | |
| | \$HGX | 3 | 3.5 | 3 | 3 | 500 | 495 | 480 | 461.7 | 447 | 430 | 410 | Philly Housing Sector | | |
| | \$IIX | 2 | 3.5 | 2.5 | 2 | 165 | 160 | 155 | 154.68 | 149 | 142 | 129 | Internet AMEX | | |
| | \$INDS | | 4 | 5 | 3.5 | 2.5 | 1860 | 1800 | 1750 | 1730.15 | 1698 | 1655 | 1600 | Industrial NASDAQ | |
| | \$INDU | | 3.5 | 4 | 3 | 3 | 10880 | 10610 | 10500 | 10485.7 | 10400 | 10290 | 9700 | Industrial Dow Jones | |
| | \$INSR | | | 2.5 | 3 | 3.5 | 3700 | 3500 | 3350 | 3229.69 | 3150 | 3100 | 2900 | Insurance NASDAQ | |
| | \$INX | | 3.5 | 4 | 3 | 3 | 240 | 218 | 208 | 198.37 | 190 | 186 | 170 | Internet CBOE | |
| | \$IUX | | 2 | 3 | 2.5 | 3 | 385 | 340 | 325 | 316.27 | 310 | 306 | 290 | Insurance S&P | |
| | \$IXCO | | 3 | 3 | 3 | 2.5 | 1100 | 980 | 930 | 925.17 | 880 | 840 | 800 | Computer NASDAQ | |
| | \$IXF | | 4 | 4 | 3.5 | 3.5 | 3100 | 2900 | 2850 | 2724.77 | 2645 | 2610-2595 | 2460 | Financial NASDAQ | |
| | \$IXTC | | 4 | 4 | 3 | 2.5 | 200 | 195 | 190 | 184.4 | 180 | 170 | 158 | Telecom. NASDAQ | |
| | \$KIX | | 3 | 3 | 3 | 2.5 | 148 | 138 | 136 | 133.64 | 131 | 129 | 120 | KBW Insurance | |
| | \$MID | | 2 | 2.5 | 3 | 3 | 705 | 700 | 690 | 642.01 | 620 | 610 | 590 | Mid Cap 400 | |
| | \$MSH | | 3 | 3.5 | 3 | 2.5 | 510 | 490 | 480 | 473.16 | 440 | 420 | 392 | High Tech Morgan | |
| | \$NBI | | 3.5 | 3.5 | 3 | 2.5 | 775 | 742 | 730 | 720.44 | 700 | 680-660 | 620 | NASDAQ BIOTECH | |
| | \$NIND | | 3 | 3.5 | 3 | 2.5 | 850 | 763 | 740 | 707.6 | 680 | 650-640 | 592 | Industrial Nasdaq National | |
| | \$NWX | | 3.5 | 3.5 | 3 | 2.5 | 255 | 240 | 236 | 223.24 | 216 | 206 | 193 | Networking AMEX | |
| | \$OFIN | | 4 | 3.5 | 3 | 3 | 4510 | 3980 | 3830 | 3793.5 | 3650 | 3460 | 3400 | Financials | |
| | \$OIX | | | 3.5 | 3 | 3 | 435 | 421 | 420 | 411.84 | 385 | 370 | 360-50 | Oil CBOE | |
| | \$OSX | | | 2.5 | 2.5 | 3 | 151 | 136 | 131 | 128.52 | 125 | 122 | 115 | Oil Services | |
| | \$RLX | | 4 | 5 | 3.5 | 3 | 466 | 454 | 440 | 433.31 | 420 | 412 | 400 | Retail S&P | |
| | \$RUT | | 2 | 2.5 | 2.5 | 3 | 700 | 685 | 655 | 619.1 | 607 | 592 | 570 | Russell 2000 | |
| | \$SML | | 4 | 4 | 3.5 | 3 | 355 | 330 | 321 | 318.33 | 300 | 292 | 285 | S&P Small Cap 600 | |
| | \$SMQ | | 4 | 3.5 | 3.5 | 3 | 460 | 452 | 440 | 427.74 | 422 | 410 | 390 | SIG Invest. Mgrs | |
| | \$SOX | | 3.5 | 3.5 | 3 | 2.5 | 455 | 418 | 409 | 405.39 | 370 | 350 | 325 | Semiconductor Phill. | |
| | \$SPX | | 2 | 2.5 | 2.5 | 2.5 | 1440 | 1300 | 1260 | 1179.31 | 1160 | 1140 | 1120 | S&P 500 Index | |
| | \$TNX | | 3 | 3 | 2.5 | 2.5 | 4.6 | 4.4 | 4.3 | 4.149 | 4.13 | 4.08 | 3.93 | 10 yr T- Note | |
| | \$TRAN | | 5 | 5 | 4 | 3.5 | 3810 | 3690 | 3600 | 3580.54 | 3400 | 3280 | 3200 | Transportation Nasdaq | |
| | \$TXX | | 2 | 2.5 | 3 | 2.5 | 660 | 655 | 640 | 577.94 | 565 | 560 | 550 | Technology CBOE | |
| | \$TYX | | 3 | 3 | 2.5 | 2.5 | 5.05-4.95 | 4.795 | 4.7 | 4.602 | 4.598 | 4.25 | 3.8 | 30 yr T-Bond | |
| | \$UTY | | 2 | 2.5 | 3 | 3 | 400 | 395 | 386 | 380.48 | 370 | 365 | 355 | Utilities Philly | |
| | \$XAL | | 4 | 4 | 3 | 3 | 62 | 54 | 51 | 48.45 | 40 | 30 | 25 | Airlines AMEX | |
| | \$XAU | | 3 | 3 | 3 | 2.5 | 100 | 96 | 94 | 91.46 | 91 | 88 | 84-80 | Philly Gold & Silver | |
| | \$XBD | | 2 | 2.5 | 2.5 | 3 | 185 | 180 | 175 | 149.43 | 145 | 135 | 130 | Broker/Dealer Securities | |
| | \$XCI | | 3 | 3.5 | 3 | 2.5 | 740-730 | 710 | 698 | 692.66 | 674 | 640 | 600 | Computer Technology | |
| | \$XNG | | | 3.5 | 3 | 3 | | 302 | 300 | 292.13 | 271 | 255 | 249 | Natural Gas | |
| | \$XOI | | 3 | 2.5 | 3.5 | 3.5 | 800 | 775 | 745 | 742.09 | 710 | 682 | 660 | Oil AMEX | |



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Research, Risk Management, Portfolio Construction

Risk management is fully integrated both externally and internally.

External risk management is integrated as a service provided by the sponsoring prime broker, Saratoga Capital. Saratoga Capital external risk analysis and reporting are multi-asset, multi-currency and can be integrated to include multiple primes or managed accounts. Standard reports can be customized to highlight product and risk analysis, including:

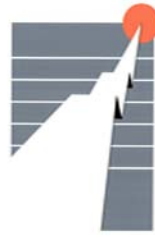
- Sector and industry concentration
- Market cap weighting
- Position liquidity constraints
- Delta and beta exposure
- Detailed performance attribution
- Benchmark comparables
- Derivative exposure.

Saratoga Capital also offers a selection of portfolio analytical tools such as standard deviation analysis, VAR and customized stress-test functionality. With real-time capabilities, these tools allow managers to immediately react to shifts in market dynamics. As a final layer of risk support, clients have access to Saratoga's staff of highly trained financial engineers. Their team can help managers with one-off projects or tailored portfolio analysis.

Internal risk management

No leverage or margin utilized. If specifically allowed by the client, index hedging in lieu of cash positions in long only mandates can be deployed. Hedging is not an objective. Although shorting mandates are considered on a case-by-case basis, individual stock shorting will be used as an opportunistic investment when deemed appropriate by analysis (Shorting will only be allowed if specifically requested by client.). Diversification within the equity index universe is wholly dependant upon the performance characteristic of the individual constituent components of the universe and is strictly a function of the research and analysis output.

Strategically, the top-down overview of the major indices evaluates the market environment. Tactically, bottom-up analysis is the basic premise of the system and methodology. Risk is mitigated through the establishment of technical parameters defining support and resistance for each and every stock in the universe. Inherent in the risk management process is the function of establishing three technically significant support levels on the charts that are monitored daily with alerts set. Each violation generates a specific report requiring attention and analysis. It is a primary function of the established process (Please refer to daily spreadsheet examples above). Any violation of significant support with confirming parameters is grounds for immediate liquidation of a long position, thus mitigating risk.



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Top Down Risk Identification

Analysis of major market and sector indexes provides a top down overall assessment of market movement and trends. Five major markets and 10 S&P sectors are analyzed daily allowing the analyst to identify risk associated with primary, major market trends. Identification of the market top down risk factors are applied to the portfolio and steps for mitigation are planned and executed. Determining major market trends and risk defines the initial approach for risk management.

Bottom-Up Risk Identification

The most critical responsibility in any asset management institution is the decision regarding when to sell. Sell triggers and stop loss levels are technically determined and programmed into the system.

Once a decision is made to purchase a stock, the chart patterns, support and resistance, breakout and breakdown points, buy and sell targets, and stop loss parameters are calculated for different market scenarios.

The constructed portfolio is actively managed on a daily basis in order to review risk factors, ensuring that buy, sell and stop loss targets are reasonable and that the portfolio positions are performing as predicted. If there is a projection of escalating risk, systematic procedures are in place to draw attention to those stocks in the portfolio. Risk mitigation and active management are an integral part of the investment process.

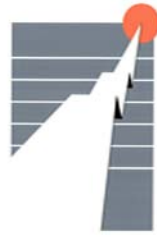
Trade Example:

Buy Discipline

The principal analyzes chart patterns and initiates positions according to the methodology. Minimum expected targets of 10% or 2 points are projected before initiating a position. There is a one day delay for trades to be completed is a built-in standard operating methodology for Investars' certified research track record and same method used for 10 year S&P 500 back test.

Example of the AIP charting and filtering specifications:

- Extended channel down,
- At/near linear regression lower channel (-2 standard deviation),
- 30 MAV in proximity of linear regression lower channel,
- 70 MAV in proximity of 30 MAV.
- Initiate position when lift above 30 MAV (Prefer volume).
- Increase partial position on lift above 70 MAV or at pullback to 30 MAV or linear support.
- Long full position above all three MAV's (30, 70, 200 MAV).



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The following chart is an example of an identified buy situation. The alarm for the specific chart pattern is set off, bringing the analyst's attention to the stock. After reviewing the chart pattern buy points are selected.

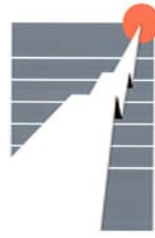


The buy example above warrants a sell, if breaking significant support after initiating the position. At least curtail further buying if back under the short term MAV when initiating position or sell partial position until back above the short term MAV. After reaching major target at an inverse juxtaposition of the example chart above, sell a majority of the position when moving back under the intermediate MAV.

Sell Discipline

One of the most challenging and critical responsibilities for any institution is the decision regarding when to sell a holding. At CCAM the formulae is extremely effective at this vital juncture. When a position is established, chart patterns are reviewed in depth and sell/stop loss parameters are set. Any violation of these parameters will draw the analyst's attention. The analyst will then apply technical rules to decide whether a sell action is appropriate. Preliminary or short term filters indicate preparation for reducing risk. The technically determined sells and stop losses anticipate, react, and act. This process repeats in a timely manner to reduce the risk of various threats developing in the charts.

The market dictates conditions and the CCAM methodology reacts to these changing conditions. Patterns can often be predictably analyzed by applying technical rules. The result can be the analysis of combinations of parameters. If a stock is breaking important support, it is sold. For example, as evidenced by the two examples of Enron and WorldCom below, even though earlier signals triggered a sell, by the time the stock broke major horizontal support of a major head and shoulders top it was an unmistakable requirement to take protective action. There are no emotional attachments to any position



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to affect investment decisions. In addition to basic technical rules, some reasons for selling a position occur when risk control is warranted due to exhaustion, failure, reversals, completion of target, or the relationship of support and resistance parameters. Positions may be reduced to mitigate risk in cases where chart direction of an individual stock becomes unclear.

Case History: Actual Trading

Enron and WorldCom are two infamous disasters that were evident on the charts. While it is also documented that analysts were recommending the stocks during the collapse, CCAM technical analysis provided the answer that both charts were developing clear signals of impending problems.

Enron: After an extended lift to 90, Enron experienced a complicated head and shoulder top until the classic “Dow Theory” lower high developed on the back side of the head and right shoulder. An Elliot wave measurement, based on the Fibonacci sequence, became available and a major target calculated at 21. Portfolio sold at 82. The neckline of the head and shoulders top was critical horizontal support. Once that support was violated and the retest failed, the technical measurement of 38 confirmed the lower target requirement. The stock proceeded directly to the lower target near 21 and bounced to the other target at 38. With channel resistance co-incident at 38, the stock failed and gapped down through the last support.

WorldCom: Similar to the Enron example, after an extended hyper lift to 65, a brief pullback to 45 occurred. The subsequent recovery to 62 created a classic “Dow Theory” lower high. An Elliot wave measurement, based on the Fibonacci sequence, became available and a dominant target calculated at 12. Portfolio sold above 60. What ensued was a test of the breakdown point at 45, with an intermediate inverted head and shoulders developing there due to multiple support levels. The upside signals were failing at 50% Gann Line resistance. The decay of the chart left well defined channel lines that factored heavily as resistance later. Price accelerated downward toward the major target still open below with a hard landing on the target level at 12. The old channel line held as resistance as the bounces created a closed flat bottom triangle that targeted the final collapse and broke support as expected for the technical rules basic to triangles.

The same situation occurred for the NASDAQ market when it was over 5000 in early 2000. Twenty-eight high tech stocks were shorted. At that time, the initial downside target was broadcast for 1750. Later, an intermediate technical formation developed and the target was adjusted for a range of 1650-1600. The NASDAQ bounced at 1620, rolled over, and an additional downside target range of 1100-850 was projected. The market reversed at 1100. The day before the portfolios went long 178 large cap stocks.

These are not isolated instances, nor are they random selections of patterns and filters. The CCAM ability, proprietary methodology, process, and system and discipline apply to a vast cross section of charts, market environments, and situations. Referring to the Pertrac analysis for a ten year back test of the S&P 500 and the certified Investars performance ranking on over 1656 equities for five years are evidence of a routine and systematic process that is practiced every day in all market conditions.



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Portfolio Construction

After an institution has determined the strategic asset allocation that rebalances the percentage of assets held in various security classes, an investment allocation in the S&P 500 index is ideally suited for the CCAM active portfolio management. CCAM is primarily concerned with portfolio construction of investments based on merit through technical analysis of stock charts. The objective is that a position is initiated when a chart is timely and significant for incremental performance. Each stock has a better prospect for greater relative Alpha performance. The CCAM tactical strategy enhances portfolio management to create added value by taking advantage of market changes with insightful analysis.

The actions of the market drive the research process and determine when the decision for investment is appropriate. Theoretically the system could evolve on a case by case basis from zero positions to 100% invested in all 500 stocks included in the S&P 500. Either extreme would be a contrarian signal in and of itself. Realistic estimates for the S&P 500 are that 120-280 positions are held indicating directional conviction, with 20-40 core positions having long term prospects. Generally, 20-40 stocks are moving counter to prevailing market direction. The number of positions held at any time is a function of individual charts. Investment is based on the potential of each chart individually.

The initial tactical allocation starts as cash equally weighted among the 500 constituent components of the S&P 500 index universe. Each position is limited to the net cash available per stock. Thereafter, the position limit is equal to the initial equal allocation net of gains and losses. Starting positions can be full or partial depending on the conviction of analysis or strength of supporting confirmation of technical signals to adequately justify investment. As a guide, full position limits require a minimum expectation of two points or 10% of accretive potential. For example, when a stock is poised for a potential breakout by building pressure on the charts, partial positions may be commenced. When resistance is penetrated the position is increased to a full allocation for that stock. A full position is reduced with increasing risk. Positions are exited when breaking significant support and moved to cash. At times the cash positions are high as the manager is reacting to increasing risk. It is the definitive defensive default strategy. Standard industry practices for cash management operations are offered at GSEC or JPM or the custodian of choice of the client.

Security Selection

Security selection is based on the merit of the individual chart for potential relative performance. Specific consideration is appropriate for identification of dominant patterns such as Fibonacci sequences, Elliot waves, O'Neal Breakouts, channels, MAV relationships, or long term chart aspects, etc.

CCAM actively manages stocks within the S&P 500 index without sector bias. Sector allocation is not predetermined. Distribution of sector allocation, the concentration or diversity, is primarily a function of the behavior of individual stocks and is determined by the analysis of each chart. Sector distribution is the result of the collective aggregate of investment in individual stocks. The system naturally gravitates to the stocks within sectors that are performing well and avoiding stocks that are indicating negative performance. AIP is not an index, but an alternative index strategy of all component parts being actively managed. The CCAM proprietary portfolio management and methodology actively manages all 500 stocks in the index for improved absolute portfolio performance. Each stock performs on its own merit, thus transitioning the portfolio to an exponential performance allocation.



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Market Environment

At Clayton Chase, risk factors generated by the market are taken into consideration. The market environment will have some affect on the investment process but is due ultimately to the technical analysis of charts. The goal of the CCAM process and methodology is neither high nor low correlation to the market. It is to make reasonable returns in any given market. Historically, the best returns are experienced when the chart patterns are definitive and technical parameters are met. Price movements up or down will trigger alarms set within the programming. The system mitigates risk by drawing attention to any stocks that touch parameters established through the proprietary process allowing the analyst to see a chart pattern as it develops and respond accordingly. The charts generally can foretell that systemic problems and rotational changes are forth coming. Any market situation can change and when a position is incorrect it is terminated.

The portfolio is in sync with the ebb and flow of the market which can differ in intensity. As such, shorting is opportunistic within a discretionary shorting mandate. Shorting is not considered a defensive strategy as much as it is viewed as an incremental return opportunity only.

Systemic Risk and Specific Risk

In reality, investors are concerned about losses, in which the fundamental concept of risk is instinctively asymmetric in nature, the classic fear and greed factor. The risk when buying a stock is that the return will be lower than expected. In other words, it is the deviation from the average expected return. Each stock has its own standard deviation from the mean, or risk. For a well diversified portfolio, the risk or average deviation from the mean of each stock contributes to the aggregate of overall portfolio risk. As a result, investors benefit from holding diversified portfolios instead of individual stocks. The risk in a portfolio of diverse individual stocks will be less than the risk inherent in holding any one of the individual stocks, provided the risks of the various stocks are not directly related. Consider a portfolio that holds two stocks that are not correlated: one that goes up while the other goes down. A portfolio that contains both assets will pay off, but inefficiently. The problem is in simultaneously holding uncorrelated stocks. Passive index investing is an average of all the constituent components in an index. An average inherently implies less than optimum performance.

Variance is a symmetric measure that counts abnormally high returns having as much risk as abnormally low returns whether high or low on the efficient frontier. Adding one risky asset to another can reduce the overall risk of a portfolio. However, the experience of the market meltdown in late 2008 demonstrated that diversification was not adequate to protect institutions from disastrous damage to portfolio performance. The systemic risk inherent in standard index investing is mitigated by the CCAM methodology which naturally moves to cash as specific risk becomes apparent with each position.

The risk inherent in standard index investing is mitigated by CCAM selectively positioning in stocks determined to have incremental positive potential with out the drag on performance of negative stocks that would otherwise be included in an index portfolio. The statistics over the long term bear out that CCAM is capable of consistently delivering outperformance while mitigating specific risk within the universe, as well as the systemic risk of the asset class.



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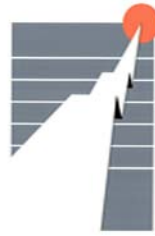
Modern Portfolio Theory (MPT): The CCAM View

Essentially, the mathematics of MPT views the markets as a collection of dice. By examining past market data, a hypotheses can be developed about probability and expectations, but this isn't helpful if the markets are actually dependent upon the much bigger and more complicated chaotic system of the world. For this reason, accurate structural models of real financial markets are unlikely to be forthcoming because they would essentially be structural models of the entire world. All mathematical models of finance still rely on many unrealistic premises that are incomplete. Charts reflect the real world of investors willing to risk investment assets. As a refined methodology and applied trading strategy, CCAM has demonstrated success in monitoring and acting on developing market situations for each position in the portfolio and universe. This process is repeated every day and has consistently outperformed traditional index investing.

Harry Markowitz published MPT first under the title "Portfolio Selection" in the 1952 *Journal of Finance*. MPT says that it is not enough to look at the expected risk and return of one particular stock. By investing in more than one stock, an investor can benefit from diversification, a reduction in the riskiness of the portfolio. MPT quantifies the benefits of diversification. In 1964, William Sharpe built on Markowitz's work in presenting the underlying rationale for the capital asset pricing model (CAPM). Markowitz stipulates that strategic asset class allocation is the majority attribute of portfolio performance. Sharpe went on to demonstrate that tactical allocation within the class further advances performance attribution. CCAM proposes that price direction of any investment is paramount. Each component of the index universe has its own equal initial allocation and builds independently on its own merit. CCAM has designed AIP portfolio management style to retain the positive aspects of passive index investing without the attributes of owning the negative performers.

Markowitz demonstrated that investing is not just about picking stocks, but about choosing the right combination of stocks among which to distribute investment assets. CCAM goes a step further by determining that the direction of price is more important in choosing the right combination as evidenced by the #1 ranking out of 121 research firms for accuracy in determining stock direction¹. To illustrate, the stock on the low end of the efficient frontier, low risk and low return, is Coca-Cola (KO). What makes KO a better investment? If it is bought at \$30 and sold at \$40, it's good. But if it is bought at \$30 and sold at \$20, it is not a good investment. The ability to identify the correct direction and timing is not only a good offense, it is a good defence. The CCAM track record has consistently proven this ability, whether in actual portfolio performance, a back test, the certified research performance and ranking, or in published industry articles.

¹ Integrity Research, by Michael Mayhew.



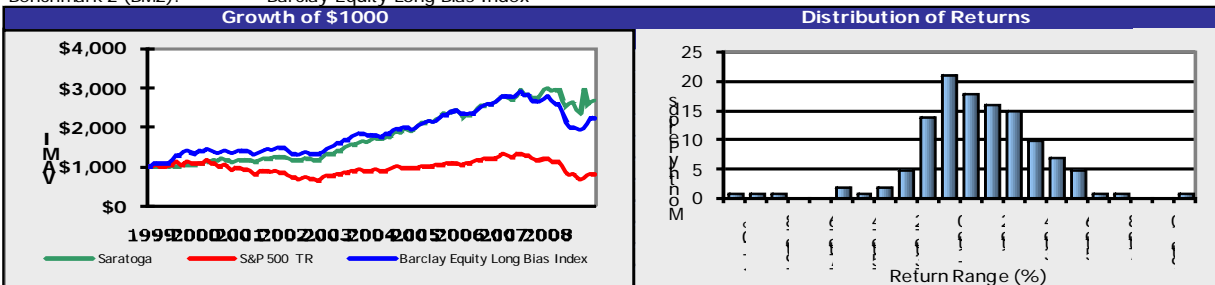
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Performance Measurement: Metrics S&P500: 10 year Back Test

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Benchmark 1 (BM1): S&P 500 TR

Benchmark 2 (BM2): Barclay Equity Long Bias Index



| Monthly Performance (%) Net of Fees | | | | | | | | | | | | | |
|-------------------------------------|--------|--------|--------|---------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Year | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Year |
| 2009 | -8.49% | -2.62% | 24.83% | -12.47% | 1.77% | 1.81% | | | | | | | 0.88% |
| 2008 | -3.43% | 0.06% | 0.16% | 7.19% | 0.64% | -2.39% | 1.44% | -0.44% | -9.13% | -5.54% | 3.39% | 1.50% | -7.29% |
| 2007 | 2.07% | 0.48% | 0.59% | 4.05% | 2.89% | -1.52% | -1.82% | -0.14% | 3.91% | 4.48% | -3.27% | 0.32% | 12.34% |
| 2006 | 4.87% | -1.36% | 3.24% | 1.38% | -2.04% | -4.81% | 2.32% | 1.16% | 1.46% | 5.12% | 2.72% | -0.90% | 13.45% |
| 2005 | -0.95% | 5.16% | -0.84% | -2.12% | 3.61% | 3.25% | 4.83% | -0.38% | 1.77% | -0.68% | 3.09% | 1.65% | 19.63% |
| 2004 | 2.27% | 1.91% | 2.07% | -1.59% | 2.73% | 3.21% | -0.72% | -0.74% | 3.64% | -1.10% | 5.15% | 2.31% | 20.62% |
| 2003 | -0.60% | -1.04% | 0.43% | 4.54% | 6.26% | 1.95% | 0.47% | 5.48% | -0.56% | 4.92% | 2.38% | 2.34% | 29.61% |
| 2002 | 0.70% | 0.97% | 2.82% | -0.58% | -0.52% | -1.87% | -2.96% | -1.10% | -0.58% | 1.19% | 2.87% | -1.31% | -0.54% |

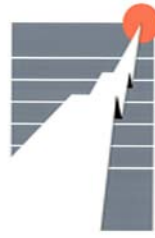
| Time Windows Analysis | | | | | | | | | |
|-------------------------|---------|---------|---------|----------|----------|--------|---------|---------|---------|
| | 1 Month | 3 Month | 6 Month | 12 Month | 18 Month | 2 Year | 3 Year | 4 Year | 5 Year |
| Percent Profitable | 60.66% | 71.67% | 82.91% | 85.59% | 92.38% | 95% | 100% | 100% | 100% |
| Average Period Return | 0.87% | 2.56% | 5.27% | 11.59% | 18.81% | 26.99% | 46.49% | 71.52% | 97.97% |
| Average Gain | 2.73% | 5.12% | 7.56% | 14.70% | 21.07% | 28.76% | 46.49% | 71.52% | 97.97% |
| Average Loss | -1.99% | -3.91% | -5.85% | -6.90% | -8.66% | -6.32% | 0.00% | 0.00% | 0.00% |
| Best Period | 24.83% | 13.25% | 20.53% | 39.57% | 48.73% | 65.54% | 102.17% | 121.58% | 149.38% |
| Worst Period | -12.47% | -14.54% | -19.73% | -14.50% | -12.96% | -9.50% | 1.80% | 20.94% | 45.79% |
| Standard Deviation | 3.68% | 5.13% | 7.15% | 11.21% | 14.27% | 17.80% | 24.60% | 26.38% | 25.84% |
| Gain Standard Deviation | 3.09% | 2.96% | 4.89% | 8.66% | 12.32% | 16.46% | 24.60% | 26.38% | 25.84% |
| Loss Standard Deviation | 2.48% | 3.48% | 5.87% | 5.08% | 3.06% | 2.21% | 0.00% | 0.00% | 0.00% |

| Statistical Analysis | | | | | | | |
|----------------------|--------|---------|---------|-------------------|---------|---------|---------|
| Latest Returns | Fund | BM1 | BM2 | Return | Fund | BM1 | BM2 |
| Last Month | 1.81% | 0.20% | 0.68% | Compound ROR | 10.09% | -1.90% | 8.27% |
| Last 3 Months | -9.31% | 15.93% | 14.22% | Cumulative Return | 166% | -18% | 124% |
| Last Year | -8.22% | -26.21% | -16.11% | Cumulative VAMI | \$2,657 | \$823 | \$2,244 |
| 2-Year | -1.71% | -19.93% | -10.29% | Best Month | 24.83% | 9.78% | 9.40% |
| 3-Year | 5.70% | -8.22% | -1.49% | Worst Month | -12.47% | -16.80% | -11.80% |
| 5-Year | 9.16% | -2.24% | 4.33% | % Positive Months | 60.66% | 56.56% | 63.11% |

| Annual Returns | | | | Risk | | | |
|----------------|--------|---------|---------|----------------------------|---------|---------|---------|
| 2009 (YTD) | 0.88% | 3.16% | 12.42% | Standard Deviation | 12.73% | 16.02% | 11.74% |
| 2008 | -7.29% | -37.00% | -28.97% | Sharpe Ratio (1.0%) | 0.74 | -0.10 | 0.65 |
| 2007 | 12.34% | 5.49% | 10.56% | Sortino Ratio (10.0%) | 0.01 | -0.84 | -0.18 |
| 2006 | 13.45% | 15.79% | 14.67% | Downside Deviation (10.0%) | 8.10% | 13.60% | 8.90% |
| 2005 | 19.63% | 4.91% | 12.26% | Max Drawdown | -20.87% | -50.95% | -34.38% |
| 2004 | 20.62% | 10.88% | 13.26% | Months In Maximum Drawdown | 9 | 16 | 16 |
| 2003 | 29.61% | 28.68% | 30.18% | Months To Recover | | 0 | 0 |

| Drawdown Analysis | | | | Comparison To Benchmark(s) | | | |
|-------------------|---------|---------|---------|----------------------------|--|--------|-------|
| 1 | -20.87% | -50.95% | -34.38% | Alpha | | 0.89% | 0.50% |
| 2 | -7.40% | -44.73% | -12.93% | Annualized Alpha | | 11.21% | 6.15% |
| 3 | -7.23% | -6.82% | -12.34% | Beta | | 0.41 | 0.51 |
| 4 | -6.75% | -6.24% | -6.96% | Correlation | | 0.51 | 0.47 |
| 5 | -6.29% | -5.00% | -4.70% | R-Squared | | 0.26 | 0.22 |

Disclaimer: ***Past Performance is not indicative of future results*** Performance through June 2009 is a backtested gross return. The performance discussed herein reflects investment for a period of time. It should not be assumed the future investors would experience returns, if any, comparable to those illustrated herein. This document is not intended as and does not constitute an offer to sell or solicit and person to purchase securities. Any information in this document is neither a recommendation or solicitation. No person should rely exclusively on the offering material when considering whether to invest.



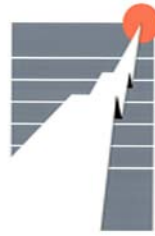
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S&P500

| Fund Statistics | |
|----------------------------------|----------|
| Annualized Return | 10.09% |
| Annualized Standard Deviation | 12.73% |
| Annualized Sharpe(5.0%) | 0.74 |
| Annualized Sortino (5.0%) | 1.24 |
| Annualized Down Deviation (5.0%) | 6.99% |
| Percent Profitable Months | 60.66% |
| Average Monthly Gain | 2.73% |
| Average Monthly Loss | (1.99%) |
| Worst Drawdown | (20.87%) |

| Historical Data | Fund | BMI | BM2 |
|--------------------|----------|----------|----------|
| Compound ROR | 10.09% | (1.90)% | 8.27% |
| Cumulative Return | 165.68% | (17.69)% | 124.39% |
| Cumulative VAMI | \$2,657 | \$823 | \$2,244 |
| Large Month Gain | 24.83% | 9.78% | 9.40% |
| Largest Month Loss | (12.47)% | (16.80)% | (11.80)% |
| % Positive Months | 60.66% | 56.56% | 63.11% |

| Risk | Fund | BM1 | BM2 |
|--------------------------------|----------|----------|----------|
| Standard Deviation | 12.73% | 16.02% | 11.74% |
| Sharpe Ratio (5%) | 0.74 | -0.10 | 0.65 |
| Sortino Ratio (5%) | 1.24 | -0.24 | 0.91 |
| Downside-Deviation (below 10%) | 8.10% | 13.60% | 8.90% |
| Maximum Drawdown | (20.87%) | (50.95%) | (34.38%) |
| Months In Maximum Drawdown | 9 | 16 | 16 |
| Months To Recover | 0 | 0 | 0 |
| Comparison To Benchmark(s) | | BM1 | BM2 |
| Alpha | | 0.89% | 0.50% |
| Annualized Alpha | | 11.21% | 6.15% |
| Beta | | 0.41 | 0.51 |
| Correlation | | 0.51 | 0.47 |
| R-Squared | | 0.26 | 0.22 |



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| Annual Returns | Fund | BMI | BM2 |
|----------------|--------|---------|---------|
| 2009 | 0.88% | 3.16% | 12.42% |
| 2008 | -7.29% | -37.00% | -28.97% |
| 2007 | 12.34% | 5.49% | 10.56% |
| 2006 | 13.45% | 15.79% | 14.67% |
| 2005 | 19.63% | 4.91% | 12.26% |
| 2004 | 20.62% | 10.88% | 13.26% |

| Latest Returns | Fund | BMI | BM2 |
|----------------|--------|---------|---------|
| Last Year | -8.22% | -26.21% | -16.11% |
| 2-Year | -1.71% | -19.93% | -10.29% |
| 3-year | 5.70% | -8.22% | -1.49% |
| 5-year | 9.16% | -2.24% | 4.33% |

| Risk | Fund | BM1 | BM2 |
|--------------------------------|----------|----------|----------|
| Standard Deviation | 12.73% | 16.02% | 11.74% |
| Sharpe Ratio (5%) | 0.74 | -0.10 | 0.65 |
| Sortino Ratio (5%) | 1.24 | -0.24 | 0.91 |
| Downside-Deviation (below 10%) | 8.10% | 13.60% | 8.90% |
| Maximum Drawdown | (20.87%) | (50.95%) | (34.38%) |
| Months In Maximum Drawdown | 9 | 16 | 16 |
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| Comparison To Benchmark(s) | | BM1 | BM2 |
| Alpha | | 0.89% | 0.50% |
| Annualized Alpha | | 11.21% | 6.15% |
| Beta | | 0.41 | 0.51 |
| Correlation | | 0.51 | 0.47 |
| R-Squared | | 0.26 | 0.22 |

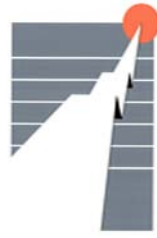


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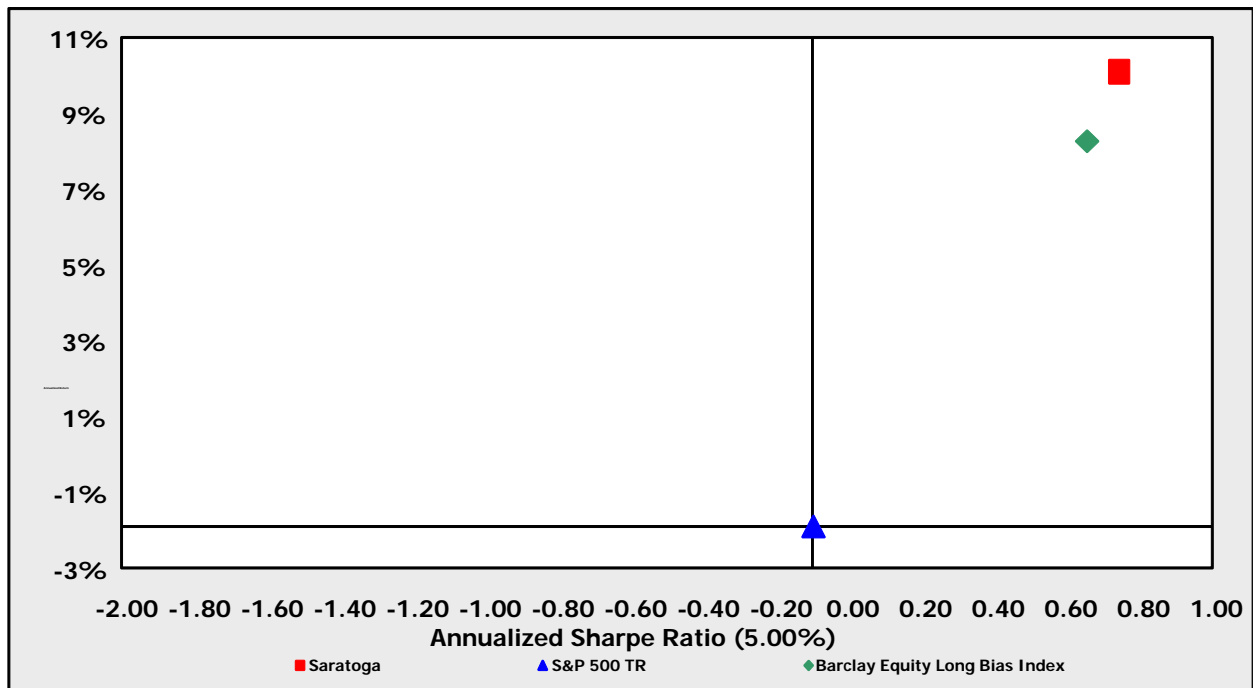
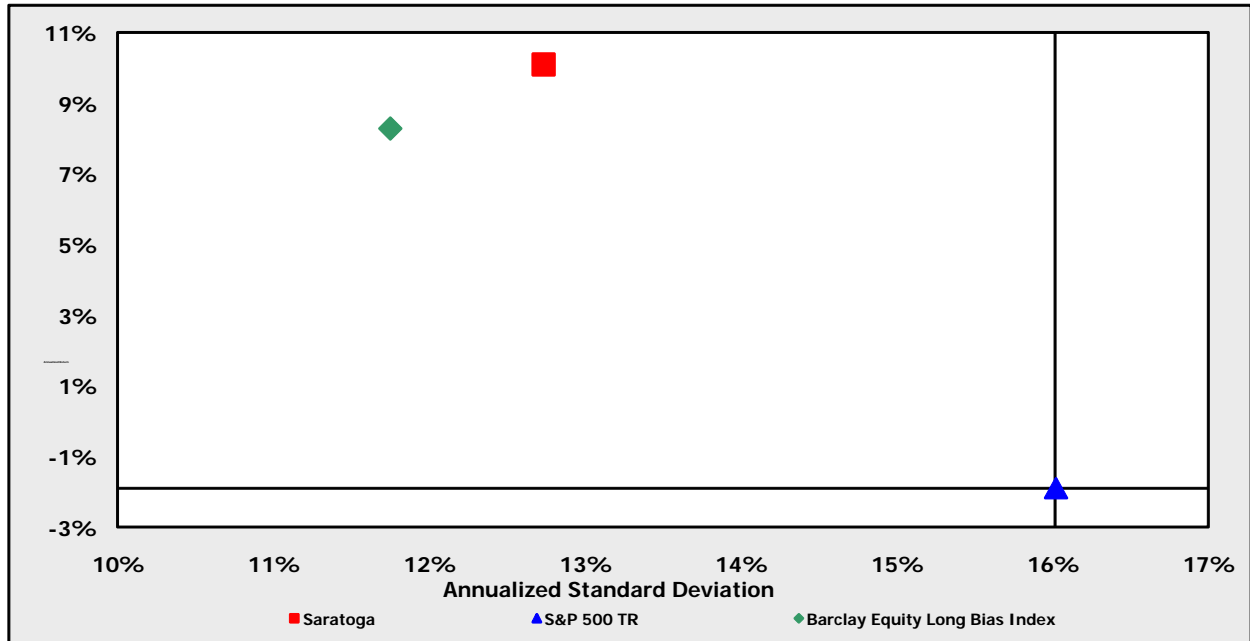
| Annualized | Standard | | | | | | | | | | |
|---|----------|-----------|----------|----------|--------------------|-------------|---------|----------|------------|---------|--------|
| Statistical Analysis | ROR | Deviation | Sharpe | Alpha | Beta | Correlation | R | R2 | Tracking | Active | Info. |
| | | | | | | | | | Error | Premium | Ratio |
| Product | 10.09% | 12.73% | 0.74 | | | | | | | | |
| Benchmark 1 | (1.90)% | 16.02% | (0.10) | 11.21% | 0.41 | 0.51 | 0.26 | 14.80% | 11.98% | 0.81 | |
| Benchmark 2 | 8.27% | 11.74% | 0.65 | 0.50% | 0.51 | 0.47 | 0.22 | 12.60% | 1.81% | 0.14 | |
| | Up | Down | Up | Down | | | | | | | |
| | Capture | Capture | Months | Months | Proficiency Ratios | Up | Down | Overall | Profitable | Treynor | Jensen |
| | | | | | | | | | Months | Ratio | Alpha |
| Benchmark 1 | 53.81% | 47.88% | 84.06% | 69.81% | 46.38% | 90.57% | 65.57% | 107.25% | 22.23% | 0.84% | |
| Benchmark 2 | 55.52% | 62.92% | 81.82% | 75.56% | 42.86% | 80.00% | 56.56% | 96.10% | 17.72% | 0.46% | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| (All returns longer than 1 year are annualized) | | | | | | | | | | | |
| Performance Analysis | 1 Month | 3 month | 6 month | YTD | 1 Year | 2 Year | 3 Year | 5 Year | 7 Year | 10 Year | |
| Product | 1.81% | (9.31)% | 0.88% | 0.88% | (8.22)% | (1.71)% | 5.70% | 9.16% | 11.82% | 10.27% | |
| Benchmark 1 | 0.20% | 15.93% | 3.16% | 3.16% | (26.21)% | (19.93)% | (8.22)% | (2.24)% | 0.92% | (2.22)% | |
| Benchmark 2 | 0.68% | 14.22% | 12.42% | 12.42% | (16.11)% | (10.29)% | (1.49)% | 4.33% | 6.91% | 7.69% | |
| +/- Benchmark 1 | 1.61% | (25.24)% | (2.28)% | (2.28)% | 17.99% | 18.22% | 13.92% | 11.40% | 10.90% | 12.49% | |
| +/- Benchmark 2 | 1.13% | (23.52)% | (11.54)% | (11.54)% | 7.89% | 8.58% | 7.19% | 4.82% | 4.91% | 2.57% | |
| | 2009 | 2008 | 2007 | 2006 | 2005 | 2004 | 2003 | 2002 | 2001 | 2000 | |
| Product | 0.88% | (7.29)% | 12.34% | 13.45% | 19.63% | 20.62% | 29.61% | (0.54)% | 1.04% | 16.76% | |
| Benchmark 1 | 3.16% | (37.00)% | 5.49% | 15.79% | 4.91% | 10.88% | 28.68% | (22.10)% | (11.88)% | (9.11)% | |
| Benchmark 2 | 12.42% | (28.97)% | 10.56% | 14.67% | 12.26% | 13.26% | 30.18% | (5.53)% | 5.48% | 3.72% | |
| +/- Benchmark 1 | (2.28)% | 29.71% | 6.85% | (2.34)% | 14.72% | 9.74% | 0.92% | 21.56% | 12.92% | 25.87% | |
| +/- Benchmark 2 | (11.54)% | 21.68% | 1.78% | (1.22)% | 7.37% | 7.36% | (0.57)% | 4.99% | (4.44)% | 13.04% | |

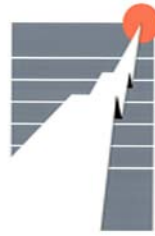
| Monthly Performance (%) Net of Fees | | | | | | | | | | | | | |
|-------------------------------------|---------|---------|---------|----------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Year | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Year |
| 2009 | (8.49)% | (2.62)% | 24.83% | (12.47)% | 1.77% | 1.81% | | | | | | | 0.88% |
| 2008 | (3.43)% | 0.06% | 0.16% | 7.19% | 0.64% | (2.39)% | 1.44% | (0.44)% | (9.13)% | (5.54)% | 3.39% | 1.50% | (7.29)% |
| 2007 | 2.07% | 0.48% | 0.59% | 4.05% | 2.89% | (1.52)% | (1.82)% | (0.14)% | 3.91% | 4.48% | (3.27)% | 0.32% | 12.34% |
| 2006 | 4.87% | (1.36)% | 3.24% | 1.38% | (2.04)% | (4.81)% | 2.32% | 1.16% | 1.46% | 5.12% | 2.72% | (0.90)% | 13.45% |
| 2005 | (0.95)% | 5.16% | (0.84)% | (2.12)% | 3.61% | 3.25% | 4.83% | (0.38)% | 1.77% | (0.68)% | 3.09% | 1.65% | 19.63% |
| 2004 | 2.27% | 1.91% | 2.07% | (1.59)% | 2.73% | 3.21% | (0.72)% | (0.74)% | 3.64% | (1.10)% | 5.15% | 2.31% | 20.62% |
| 2003 | (0.60)% | (1.04)% | 0.43% | 4.54% | 6.26% | 1.95% | 0.47% | 5.48% | (0.56)% | 4.92% | 2.38% | 2.34% | 29.61% |
| 2002 | 0.70% | 0.97% | 2.82% | (0.58)% | (0.52)% | (1.87)% | (2.96)% | (1.10)% | (0.58)% | 1.19% | 2.87% | (1.31)% | (0.54)% |
| 2001 | (1.99)% | (0.26)% | (5.10)% | 0.92% | 3.88% | 0.85% | (0.02)% | (1.44)% | (1.59)% | 0.89% | 3.09% | 2.14% | 1.04% |
| 2000 | (0.76)% | 2.16% | 2.78% | 0.72% | (0.23)% | 1.38% | 0.06% | 5.20% | 0.54% | 0.70% | (0.98)% | 4.23% | 16.76% |



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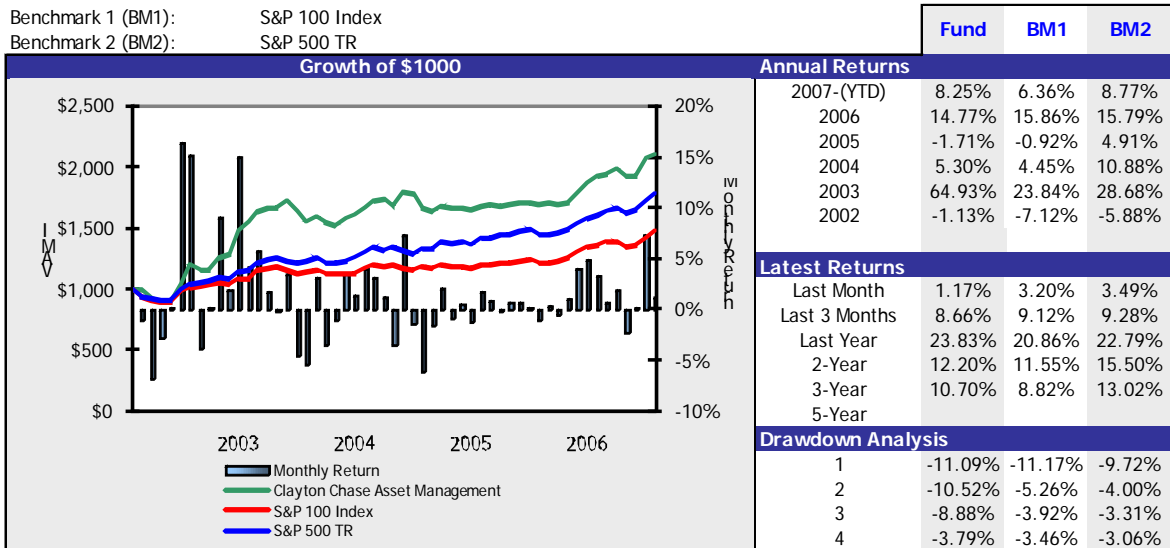




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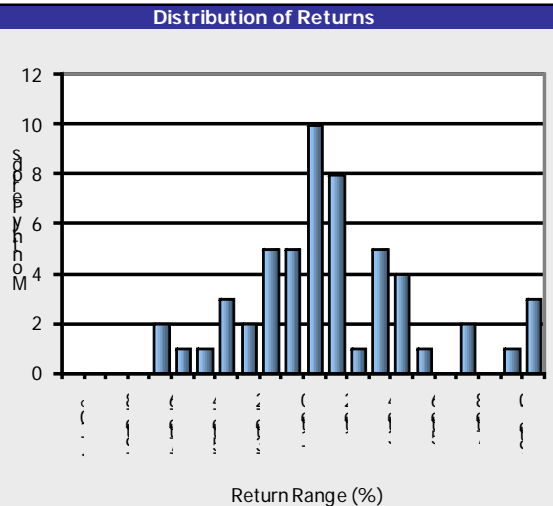
S&P 100: Actual Certified Performance

Clayton Chase Asset Management LLC
S&P 100 portfolio



| Monthly Performance (%) Net of Fees | | | | | | | | | | | | | |
|-------------------------------------|--------|--------|-------|--------|--------|--------|--------|--------|-------|--------|-------|--------|--------|
| Year | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Year |
| 2007 | 1.99% | -2.33% | 0.06% | 7.35% | 1.17% | | | | | | | | 8.25% |
| 2006 | -0.24% | 0.75% | 0.68% | 0.12% | -0.98% | 0.38% | -0.56% | 1.02% | 4.03% | 4.89% | 3.32% | 0.62% | 14.77% |
| 2005 | 1.17% | -3.58% | 7.40% | -1.42% | -6.08% | -1.58% | 2.06% | -0.95% | 0.46% | -1.23% | 1.69% | 0.96% | -1.71% |
| 2004 | 1.73% | -0.22% | 3.51% | -4.55% | -5.49% | 3.22% | -3.52% | -1.03% | 3.52% | 1.48% | 4.01% | 3.17% | 5.30% |
| 2003 | -6.90% | -2.80% | 0.10% | 16.37% | 15.14% | -3.79% | 0.15% | 9.02% | 1.92% | 15.06% | 4.21% | 5.84% | 64.93% |
| 2002 | | | | | | | | | | | | -1.13% | -1.13% |

| Statistical Analysis | Fund | BM1 | BM2 |
|-----------------------------------|---------|---------|---------|
| Return | | | |
| Compound ROR | 17.88% | 8.89% | 13.59% |
| Cumulative Return | 110% | 47% | 77% |
| Cumulative VAMI | \$2,097 | \$1,467 | \$1,775 |
| Best Month | 16.37% | 8.48% | 8.24% |
| Worst Month | -6.90% | -7.12% | -5.88% |
| % Positive Months | 64.81% | 66.67% | 74.07% |
| Risk | | | |
| Standard Deviation | 16.38% | 8.98% | 8.90% |
| Sharpe Ratio (3.0%) | 0.91 | 0.67 | 1.15 |
| Sortino Ratio (10.0%) | 0.87 | -0.16 | 0.56 |
| Downside Deviation (10.0%) | 8.03% | 6.46% | 5.76% |
| Max Drawdown | -11.09% | -11.17% | -9.72% |
| Months In Maximum Drawdown | 5 | 3 | 3 |
| Months To Recover | 4 | 3 | 3 |
| Comparison To Benchmark(s) | | | |
| Alpha | | 0.71% | 0.24% |
| Annualized Alpha | | 8.85% | 2.98% |
| Beta | | 1.04 | 1.13 |
| Correlation | | 0.57 | 0.61 |
| R-Squared | | 0.33 | 0.38 |

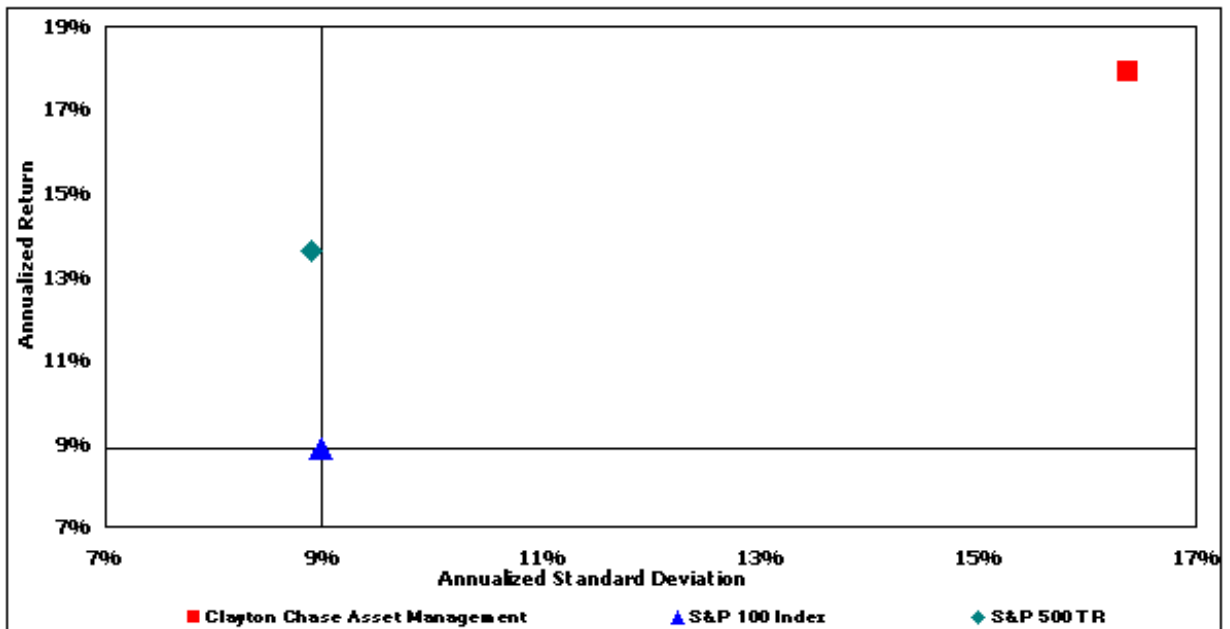
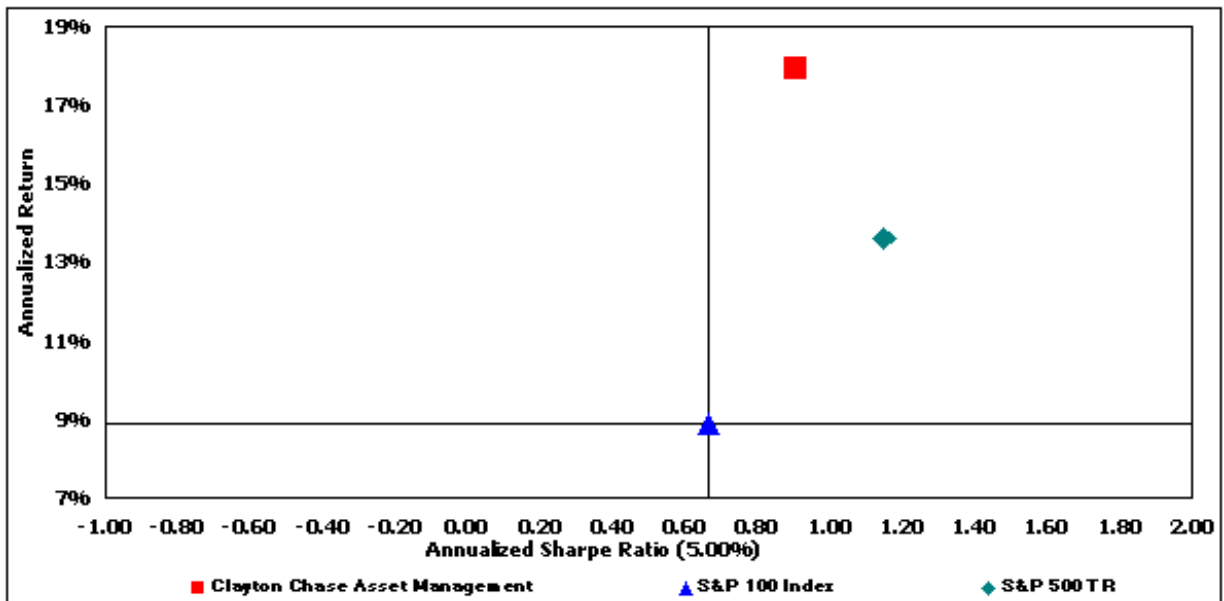


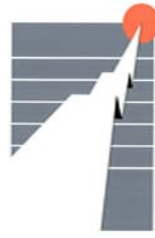
Disclaimer: ***Past Performance is not indicative of future results** Performance for 2007 is an estimate net of all fees and expenses and subject to change pending audit results. The performance discussed herein reflects investment for a period of time



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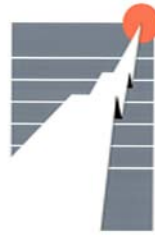




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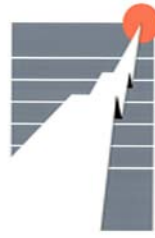
| 1 Year Stats | | | | | | |
|--------------------|------------|------------|----------|------------|----------|------------|
| Risk Table | Investment | | Bench 1 | | Bench2 | |
| | Month | Annualized | Month | Annualized | Month | Annualized |
| Compound ROR | 1.80E-02 | 23.83% | 1.59E-02 | 20.86% | 1.73E-02 | 22.79% |
| Arithmetic Mean | 1.83E-02 | | 1.61E-02 | | 1.74E-02 | |
| Standard Deviation | 2.66E-02 | 9.21E-02 | 2.08E-02 | 7.21% | 1.70E-02 | 5.89% |
| Semi Deviation | 2.26E-02 | 7.85E-02 | 2.46E-02 | 8.51% | 1.90E-02 | 6.58% |
| Gain Deviation | 2.37E-02 | 8.20E-02 | 1.23E-02 | 4.25% | 1.30% | 4.50% |
| Loss Deviation | 1.25E-02 | 4.34E-02 | 2.24E-02 | 7.77% | | |
| Down Dev. (10.00%) | 1.02E-02 | 3.52E-02 | 1.27E-02 | 4.39% | 8.19E-03 | 2.84% |
| Down Dev. (3.00%) | 7.81E-03 | 2.71E-02 | 1.08E-02 | 3.74% | 6.37E-03 | 2.21% |
| Down Dev. (0.00%) | 6.92E-03 | 2.40E-02 | 1.00E-02 | 3.47% | 0.56% | 1.96% |
| Sharpe (3.00%) | 0.60 | 2.06 | 0.66 | 2.27 | 0.88 | 3.04 |
| Sortino (10.00%) | 0.98 | 3.41 | 0.63 | 2.17 | 1.13 | 3.93 |
| Sortino (3.00%) | 1.98 | 6.88 | 1.25 | 4.31 | 2.32 | 8.05 |
| Sortino (0.00%) | 2.60 | 9.00 | 1.59 | 5.51 | 3.06 | 10.59 |
| Skewness | 0.66 | | (1.15) | | (0.60) | |
| Kurtosis | 0.36 | | 2.57 | | 0.92 | |
| Sterling Ratio | | | | | | |
| Max Drawdown | -2.33E-02 | | -3.46% | | -1.96% | |
| | | | | | | |



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| 3 Year Stats | Investment | | Bench 1 | | Bench2 | |
|--------------------|------------|------------|----------|------------|----------|------------|
| Risk Table | Month | Annualized | Month | Annualized | Month | Annualized |
| Compound ROR | 8.51E-03 | 10.70% | 7.07E-03 | 8.82% | 1.03E-02 | 13.02% |
| Arithmetic Mean | 8.89E-03 | | 7.27E-03 | | 1.05E-02 | |
| Standard Deviation | 2.81E-02 | 9.74% | 2.05E-02 | 7.09% | 2.09% | 7.25% |
| Semi Deviation | 2.69E-02 | 9.31% | 2.42E-02 | 8.37% | 2.50% | 8.65% |
| Gain Deviation | 2.09E-02 | 7.23% | 1.14E-02 | 3.94% | 1.32E-02 | 4.59% |
| Loss Deviation | 1.68E-02 | 5.80E-02 | 9.34E-03 | 3.24E-02 | 7.51E-03 | 2.60% |
| Down Dev. (10.00%) | 1.85E-02 | 6.41E-02 | 1.55E-02 | 5.36% | 1.43E-02 | 4.94% |
| Down Dev. (3.00%) | 1.57E-02 | 5.46E-02 | 1.25% | 4.31% | 1.16E-02 | 4.01% |
| Down Dev. (0.00%) | 1.46E-02 | 5.06E-02 | 1.12E-02 | 3.87% | 1.05E-02 | 3.62% |
| Sharpe (3.00%) | 0.23 | 0.79 | 0.23 | 0.81 | 0.38 | 1.32 |
| Sortino (10.00%) | 0.03 | 0.10 | (0.06) | (0.20) | 0.16 | 0.55 |
| Sortino (3.00%) | 0.38 | 1.33 | 0.37 | 1.28 | 0.67 | 2.33 |
| Sortino (0.00%) | 0.58 | 2.02 | 0.63 | 2.19 | 0.98 | 3.40 |
| Skewness | 0.17 | | (0.28) | | (0.41) | |
| Kurtosis | 0.79 | | (0.74) | | (0.65) | |
| Sterling Ratio | 0.77 | | 0.66 | | 1.01 | |



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Biography

James H. Hopkins founded When2Trade in 1999 and is the Director of Research and chief research analyst. He has been designated Certified Portfolio Manager (CPM) by the American Association of Financial Management.

Hopkins received a BA degree from the University of Illinois, where he qualified for three majors in Political Science, Business Administration, and Industrial Geography. His post-graduate thesis at Austin College in Texas was “Oil: Political and Economic World Ordering, Post World War II.”

Hopkins began his career as a petroleum engineer supervising information laboratories for the Well Information Systems & Engineering division of N.L. Industries (National Lead). Being promoted into an elite group of 37 engineers out of 600, he pioneered computerization of information systems with primary responsibility of onsite well control and blowout prevention for deep offshore gas exploration for 8 years, with 2 1/2 years on an Exxon exploration drill ship.

Hopkins became a project manager with a “Big 3” management consulting firm, Alexander Proudfoot & Co., Chicago, IL and the American Association of Industrial Management (AAIM), St. Louis, MO specializing in corporate turnarounds from 1982-86. Projects included National Advertising on Park Avenue and NYLife in New York City, as well as nuclear power plants in Pennsylvania, Florida, and Texas for NAVCO and a re-organization of the nation’s largest apartment real estate corporation.

Recruited by Paine Webber, Hopkins was ranked fifth in his peer group nationally in the first year. He was then recruited by AG Edwards to open a new office where he managed over 800 accounts and \$45 million in assets. He then moved to an institutional research boutique with 45 institutional clients. Working closely with the Director of Investments at IBM, and Sam Syverud at the Deere Pension Trust, Hopkins developed a methodology for technical analysis that improved predictability and performance.

He has served as a Trustee for the Episcopal Church, Springfield, Illinois Diocese for 12 years and on the founding Board of Directors for Omni Bank, which was subsequently acquired.

CCAM: Product Development & Evolution

The AIP proprietary trading strategy is the result of 20 years of development that demonstrates successful research, proven performance and achieved the top ranking among its industry peers. The strategy was developed for large institutional portfolios as a methodology that is able to realize significant alpha for absolute returns while mitigating risk.

When2Trade was ranked first for research firms covering greater than 500 equities for most of 2003¹. Routinely it has ranked top three in 9/10 S&P sectors and fourth in the 10th and smallest sector². As of June 2004, James H. Hopkins, the founder and Director of Research, was ranked first, second, or third on

² Investars.com, the Industry’s independent Research Rating and Ranking platform.



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493 equities out of 121 research firms for the one year period¹. He sustains the #2 ranking for the three year period ending February, 2005 and July, 2005¹. In January 2006 he was listed as the #1 research performance for the certified four year period by Investars.com. The #1 ranking for 2006 resulted in the #1 rank for the five year period in 2007.

The objective is to translate the success of the existing research company, When2Trade, which has been producing institutional equity research since 1999. The research system and process developed is proven with a five year certified track record that averages 29.1% per year covering 1646 equities in the universe over the five year period. This ranks as the #1 performance among 42 major research firms including Goldman Sachs, Morgan Stanley, Merrill Lynch, Standard & Poor's, RBS, UBS, Oppenheimer, et al. When2Trade has been listed as a top 10 research firm in the Institutional Investor magazine and named the most accurate in determining direction of stock movements among 121 research firms by Integrity Research. More than 150 institutions and hedge funds have paid for portfolio research services. Industry relationships include contracts to provide research on Goldman Sachs institutional research platform, Reuters, Multex, Bloomberg, Soleil, Bridge, Mindset, Bank of New York Jaywalk platform, First Call, etc and interviews with 73 business journalists including CNBC. The experience, prowess of the track record, and top ranking among major firms is being leveraged to transition the certified top ranked portfolio performance into direct portfolio management based on the proven system utilized in the process for the Clayton Chase Asset Management.

History of When2Trade

Founded in 1999, When2Trade is a privately held company established by Wall Street veteran, Jim Hopkins. The company is a leading provider of technically oriented research³ and pricing analysis for the hedge fund and institutional investor community. The foundation of the technical analytics was created over a sixteen-year period while the principal Jim Hopkins acted as consultant/sub-advisor of managed money for two major US pension funds. The system is proven, documented, and certified². Using this dynamic trading function lauded as the top technical trading system currently in use in the US market⁴, When2Trade is building the most extensive independent, uncontaminated research product in the country³.

Exactly 100 institutions have paid for services from January, 2000 through June, 2002 (primarily hedge funds, bank trust departments, and money managers). A total 153 Institutions have paid for professional services. It was at this time that a contractual relationship began with the Bank of New York to provide independent research. W2T produced over 500 individual published equity research reports in 2002-2003. Reuter's Multex platform alone had W2T research requested by institutions over 25,000 times in 2003. Research has been distributed by Reuters, Multex, Bank of New York, Thomson's FirstCall, Soliel, Mindbranch, Bloomberg, Yahoo Finance, Sungard, Bridge Information Systems, Investor.com™, The Research Summary.com in London and Bloomberg's *BTrade*©, and many other sources. Hopkins has been quoted in Money Magazine, interviewed by 73 news publishers nationwide for analysis and quotes

³ As reported by Multex Investor.com a Div of Reuters and Investars.com, January, 2004 Institutional Investor article by Michael Mayhew, Integrity Research.

⁴ Investars.com Institutional website.



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on individual equities in the major news publications. During 2006 and 2007 he was a preferred research provider on Goldman Sachs institutional research platform.

Investars.com certifies and evaluates the published research. When2Trade has frequently been the top ranked research firm overall in the category of firms covering greater than 500 equities on Investars. W2T was ranked #1 for research firms covering greater than 500 equities for 2003² and was ranked top three in 9/10 S&P sectors and fourth in the 10th and smallest sector². As of June 2004, Hopkins was ranked *first, second, or third* on 493 equities out of 121 research firms for the one-year period². He was ranked second for the three year period ending February 2005². In January 2006 he was ranked # 1 for the certified four-year period by Investars². In January 2007 he was ranked # 1 for 2006².

Excerpt from Integrity Research profile by Michael Mayhew:

When2Trade, “the Company”, can be characterized as an independent research firm providing technical analysis and price forecasting for a broad range of publicly traded US equity securities, and some foreign equities. When2Trade has developed a unique, proprietary system for measuring stock price movements that has proven to be substantially superior to competitive methods⁵. When2Trade’s accuracy has been measured by third-party rating resources confirming the consistency of the Company’s predictive model⁶. When2Trade currently ranks in the top five of all technical and independent research firms in each of the market sectors it covers⁷ and was listed in the January 2004 edition of Institutional Investor magazine as one of the top ten independent research firms, # 4 overall in all style categories.

Performance (Validation of Results-Hypothetical)

James Hopkins is the founder and principal at both Clayton Chase and When2Trade. Clayton Chase Asset Management is a recently launched company and therefore does not have long term statistics on the performance of products. However, since Clayton Chase was created from the top ranked research company, When2Trade, data is available for performance in three categories;

- Certified Actual Research Performance,
- Back-Test Results,
- Portfolio Performance.

Performance: Certified Research

Investars.com provides certified performance and rankings for institutional research companies. With a universe covering 1656 equities, When2Trade ranked #1 for research performance by Investars as of January 1, 2006 for the four year period among all major firms covering greater than 500 equities (see Investars webpage printout below). When2Trade was also ranked #1 for the one year period for 2006. Over the certified four year period, average annual returns are 24.7% in the S&P 500 index, 29.1% for the entire universe covering 1656 equities, and 35% for the equities covered within the Russell 2000 index.

⁵ As reported by Multex Investor.com a Div of Reuters

⁶ As reported by Multex Investor.com a Div of Reuters and Investars.com

⁷ January, 2004 Institutional Investor article by Michael Mayhew, Integrity Research.



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Four year performance certified by Investars is \$11.00 / day / \$10,000 invested for the four year period of 2002-2006.

Metrics (Peer Group Comparison)

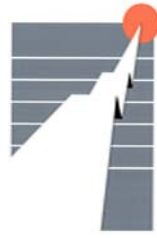
Clayton Chase Asset Management, portfolio manager in US Equities, was created by James H. Hopkins out of a certified top rated research company that has been ranked 1st in the S&P 500, 1st in the Russell 2000, 2nd in the (total universe of 1646 equities) for performance for the past four years. Mr. Hopkins is the key principal Clayton Chase and his success in equities research is certainly portable to the current firm under SEC and CFA Institute guidelines.

- 2007
Investars-Ranked #1 certified research performance for **1-yr** period among 42 major firms covering greater than 500 equities.
Integrity Research- Ranked #1 out of 121 firms for accuracy in determining direction of stock movements.
- 2006
Investars-Ranked #1 certified research performance for **4-yr.** period among 42 major firms covering greater than 500 equities.
Integrity Research- Ranked #4 in sell recommendations for **1-yr** period.
- 2005
Investars-Ranked #2 for **3 yr.** certified research performance in buy and sell recommendations.
Integrity Research- Ranked #3 best performing sell recommendations.
- 2004
Investars-Ranked 1, 2 or 3 best-performing analyst on 493 US equities out of 121 major research firms.
Institutional Investor Magazine Listed as **top 10** research firm.
Bank of New York Jaywalk Top 10 ranking on independent research platform.
- 2003
Investars- Ranked #1 certified research performance for **1-yr** period among 42 major firms covering greater than 500 equities.

Execution/Trading

For those individual and specific stocks that are determined to require action from the output of the system, process, and analysis, the portfolio manager determines the amount of stock to be traded in the account and informs the trading desk of the order electronically or verbally. The analyst may interface with the trader to give specific instruction for handling the order, i.e., support and resistance 40-42; buy on support at 40 but curtail buying if below 40 until next support level. Conversely, if buying and stock moves above 42 then speed up purchases if momentum is developing and open territory is available above to the next resistance. This is an example of an important benefit to enhance returns by preventing trading inefficiencies and slippage at impact of the focal point in trading. Additionally it has the benefit of curtailing positions until a lower entry point at support, or at such time resistance is penetrated.

Trade allocations are fair and equitable, being spread across the portfolios on a percentage basis. Trade errors by principal are all but non-existent historically, but are dealt with immediately. Best execution is



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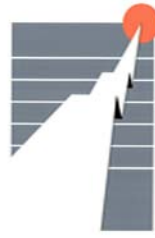
accomplished by association with Saratoga Capital with correspondent relations with Goldman Sachs, JPMorgan Chase, and Interactive Brokers.

Independent and verifiable valuation policies and procedures are the responsibility of industry sources at custodial choice of client. It is CCAM policy that investments will be made only in liquid securities traded on the major exchanges.

Personal trading policies and procedures restrict employees from trading for their own account in the universe of stocks employed for client portfolios. The company will maintain an account for the benefit of employees on a last in, last out basis. Processes and controls are SEC compliant in that duplicate brokerage statements are required to be submitted directly to management for monitoring. Violations will not be tolerated in related accounts.

Managed Account Features

- Separately managed accounts available with a minimum of \$5,000,000.00.
- Full transparency and custodian through third party choice of client.
 - Prime Brokerage offered:
 - Client choice of custodian, or
 - JPMorgan Chase,
 - Goldman Sachs.
- Investor has daily access to account and portfolio data.
 - Portfolios are readily marked to market.
 - Investments are publicly traded equities only, S&P500 primary universe.
 - No illiquid investments considered in portfolios.
- No lock-up.
 - Liquidity is offered with 7 days notice.
 - Tax basis established each security, no phantom tax consequences.
- Superior long only and long-biased comps to benchmark with lower volatility.
 - Exceptional returns:
 - Certified research: 5 years, 1646 equities, rank # 1, 29.1% avg/yr.
 - Verified: 5 years, long/short/no position,
 - S&P 500, 24.7% avg/yr;
 - S&P 100, 27.2% avg/yr.
 - Tested: 10 year back test, long/no position,
 - S&P 500, 16.8% avg/yr,
 - 1121 bps Alpha,
 - Below benchmark Volatility.
- Mitigates risk at market, index, and constituent component level. Top-down sector analysis, bottom-up selection of constituent components by merit. Process does not allow position in individual stocks if breaking relevant or significant support.
- High capacity capability, system and process designed for large portfolios.



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Credentials

Active management based on top ranked equity research among all major firms covering greater than 500 equities.

- #1 ranking among 42 major firms for 5 years.⁸
- #1 ranking among 121 firms for accuracy determining stock direction.⁹
- #4 ranking, top 10 research firms.¹⁰

Performance; Certified #1 rank (5 years)

Exceptional certified long term performance, average annual % returns (long/short):

- 24.7% S&P 500,
- 27.1% S&P 100,
- 29.1 % stock universe, 1646 equities,
- 35.6% Russell 2000 (350 stocks only).
- 16.6% S&P500, 10 year back test, long only.
- 13.0% per quarter average % return on \$100 million long/short portfolio.
- Routinely ranked top three in 9/10 S&P sectors and fourth in the 10th.¹⁰

Mitigate Risk

- System does not allow positions to be held if support is broken, thus avoiding major losses.
- Process and System emanate to stocks which merit investment.
- Long 100% mandates may utilize substitutions for cash.
- External risk management is provided by Saratoga Capital.
- Process determines sector allocation and diversification/concentration within universe.
- Process selects each component stock within an index being appropriate as an investment determined by the research system.

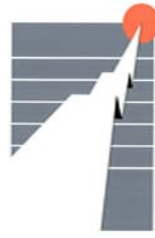
Benefits

- Performance
- Liquidity
- Transparency
- Diversification
- Reduced risk

⁸ Investars.com Institutional website.

⁹ Integrity Research, by Michael Mayhew.

¹⁰ Investars.com, as reported in an article by Michael Mayhew, Integrity Research.



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Performance

CCAM strives to outperform the benchmark index by initially equal weighting each constituent component, investing in each stock when the trend is moving up and not investing when the trend of a stock is down. The portfolio transitions to an exponentially weighted portfolio of every constituent component of the S&P 500 index (J.P. Morgan released the RiskMetrics methodology, a study done with financial institutions and regulatory bodies around the world that demonstrated that exponential weighting significantly improves forecasting accuracy and responsiveness in extreme market conditions.). The typical index fund is not managed to outperform.

Liquidity

Index Portfolios only traffic in the 1500+ stocks that represent 90% of the market capitalization of the U.S. equity market. ADRs are included only if they are represented in these major indices. The 1500+ stocks are sorted into their various Markets, Sectors, Groups and Styles. Investments are only in publicly traded equities, the S&P500 is the primary universe. No illiquid investments are considered for the portfolios.

No lock-up, liquidity is offered with 7 days notice.

Diversification

AIP maintains the benefits of traditional index mutual funds. Although they are private accounts, AIP portfolios offer investors the opportunity to spread their investment risk across a range of securities while providing exposure to a variety of distinct sectors and market caps within the portfolio universe.

Transparency

Full transparency through outsourcing of all back office operations to third party industry sources. Accounts are viewable on-line 24 hours a day. Investor has daily access to account and portfolio data. Portfolios are readily marked to market in real time by public exchanges. Each client receives separate confirms and statements from third party custodian.

Reduced risk

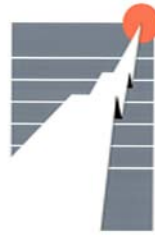
By closely tracking the specific index components, portfolios avoid the risk of performance that can result from poor market conditions. System does not allow positions to be held if support is broken, seeking to avoid major losses by moving to cash. Process mitigates risk for every position in portfolio.

Ease of Due Diligence

Outsource back office; reporting, custody, etc. with respected Industry sources for ease of due diligence burden.

Execution/Trading

Trading duties have been outsourced to Saratoga Capital, LLC's agency team of equity and option traders. Saratoga Capital will act as an extension of CCAM and handle all trading duties. Saratoga Capital has direct access to all major US securities exchanges and the major private networks, further assuring compliance with CCAM's best execution policies.



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Organizational/Legal Structure

Clayton Chase Asset Management, LLC is registered with the State of Illinois, pursuant to SEC registration. James H. Hopkins is the owner of legal entity and When2Trade is a sole proprietorship.

Infrastructure

CCAM has contracted with Saratoga Capital's Prime Services Group for back- and middle-office functions. Straight through processing is achieved through CCAM's choice of Goldman Sachs as the preferred custodian for its separately managed accounts. The preferred order execution platform is REDIPlus which is fully integrated with Goldman Sachs' back office. Goldman's back office directly feeds Saratoga Capital's choice of Portfolio Shop's FixQ portfolio reporting system. Combined access to Goldman's 360 reporting system and FixQ gives CCAM's clients full daily transparency.

Prime Brokerage, Custodian

Saratoga Capital offers comprehensive reporting, proprietary performance analysis and, for qualified managers offers a real time risk management system. Saratoga believes in staying at the forefront of technology and its risk systems are always evolving to stay current in today's ever changing marketplace.

Clearing

CCAM clients will have the opportunity of choosing the clearing and settlement services of Goldman Sachs Execution and Clearing, LP ("GSEC") or JPMorgan Chase (JPM).

Each client account is held on a fully disclosed basis. Accounts are not comingled. Portfolio assets are recorded on the books of GSEC or JPM.

Portfolio Reporting

Performance tracking is a critical requirement for CCAM. Saratoga Capital Prime Services (SC) provides reporting solutions for each separate account. CCAM makes use of systems that offer a variety of daily risk measures and reports. These tools also augment the transparency available to clients on a daily basis.

Portfolio Components

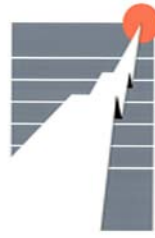
- Holdings and distribution overview
- Exposure analysis
- Benchmark comparisons

Risk Components

- Robust VAR measures
- Correlations and beta
- Worst-period analysis

Auxiliary Components

- Performance Ratios (Sharpe, Gain/Loss...etc.)
- Delta-adjusted portfolio
- Customized client mandated red flags



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Real Time Risk Management System

For qualified managers, Saratoga has real-time portfolio management that allows the consolidation of multiple asset classes, multiple currencies and multiple prime brokers in a single integrated platform. Saratoga has a multi-asset, multi-currency and multi exchange solution. Managers have full transparency of their portfolio in real-time.

Detailed Portfolio Reporting

Performance tracking is a critical requirement for the hedge fund manager and clients. Saratoga Capital offers PortfolioShop's flagship enterprise investment management solution, FixQ, to provide the easiest and most comprehensive reporting solutions. The FixQ investment management solution focuses on the following mission critical components to help effectively manage investments.

- Portfolio Accounting
- Performance Measurement
- Reporting.

Execution Services

At Saratoga Capital managers have the ability to utilize their Agency team. The experienced Agency Traders are a critical compliment to any electronic execution platform. The equity and options execution business consists of seasoned professionals and a team on the floor of the American Stock Exchange. All orders are done on an agency-only basis and will receive complete trading anonymity and confidentiality.

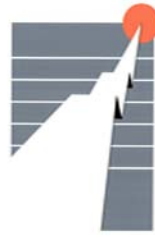
Infrastructure

The infrastructure is in place. The building and office space is owned by the principle. Operations started in 1999. Back office operations, trading desk operations, and reporting is outsourced to the New York office of Saratoga Capital, an introducing prime broker using custodian services of Goldman Sachs.

Privacy Policy

CCAM is committed to safeguarding the personal information that you provide. This Privacy Policy describes how we handle and protect personal information we collect about individuals who apply for or receive our products and services. The provisions of this notice apply to former customers as well as our current customers.

We limit access to your personal information to those employees who need to know in order to conduct our business, service your account, and help you accomplish your financial objectives, such as providing you with a broad range of products and services. Our employees are required to maintain and protect the confidentiality of your personal information and must follow established procedures to do so. We maintain physical, electronic, and procedural safeguards to protect your personal information. We do not rent or sell your name or personal information to anyone.



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Disclosure to Non-Affiliated Third Parties

In order to support the financial products and services we provide to you, we may share the personal information described above with third-party service providers and joint marketers not affiliated with us, including: Financial service institutions (e.g., advisers, dealers, brokers, trust companies and banks) with whom we have joint marketing agreements, such as agreements to market financial services or products that we jointly offer, endorse or sponsor; and Companies under contract to perform services for us or on our behalf, such as vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance and development, transaction processing and marketing services. These companies acting on our behalf are required to keep your personal information confidential. Also, we may disclose personal information with non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, we may disclose personal information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect our rights or property. Except as described in this privacy policy, we will not use your personal information for any other purpose unless we describe how such information will be used at the time you disclose it to us or we obtain your permission to do so.

Accessing and Revising Personal Information

We endeavor to keep our customer files complete and accurate. We will give you reasonable access to the information we have about you. Most of this information is contained in account statements that you receive from us and applications that you submit to obtain our products and services. We encourage you to review this information and notify us if you believe any information should be corrected or updated. If you have a question or concern about your personal information or this privacy notice, please contact the principals.

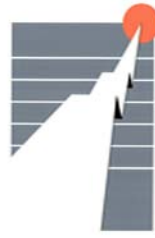
Disaster Recovery Plan/ Business Continuity

To ensure the continuity of CCAM's key business processes in the event of any circumstance resulting in:

- The sudden incapacity of any key team member
- An outage of CCAM headquarter location

Policies

Disaster Recovery and Continuity Plan Testing: In accordance with NFA requirements this document must be reviewed and updated on an annual basis. The plan outlined within this document must be executed, as a test, on an annual basis. Any deficiencies found as a result of testing should be documented and remedied. Once any outstanding deficiencies have been remedied the test should be signed-off by a member of the senior leadership team.



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Trading, Market and Business Expertise and Authority

CCAM's key business is the management of financial assets and the employment of those financial assets in the financial markets. As such, to ensure continuity of related trading activities CCAM must ensure that multiple individuals residing in dispirit locations poses the authority/skills necessary to:

1. Run all required software packages related to trading and asset management.
 2. Execute trades (including trade liquidation) for all trading accounts held by CCAM.
 3. Instruct custodial service provider to move assets between accounts and/or to clients.
 4. Monitor market conditions and, if necessary, enact stop-gap and risk-management protocols.
- Primary Trader:
 - Secondary Trader:
 - Tertiary Trader:

This document, for reference purposes, must be permanently available at each office location (currently Edwardsville, IL) in the following capacities:

- Hardcopy located within each office's Policy and Procedure manual
- Softcopy located on each office's primary computer
- Softcopy located on each office's redundant lap-top computer

Office Redundancy

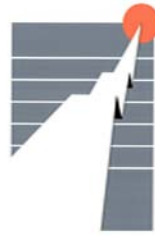
There must be at all times at least two physical offices located at two geographically dispersed locations. Each office must poses trading expertise as listed above as well as redundant computer systems and data feeds. Current redundant office locations include:

- Primary Office: 201 Hillsboro Ave., Edwardsville, IL 62025
- Secondary Office: 202 West Lake, Edwardsville, IL 62025

Computer Hardware and Software Redundancy

Each office location must maintain at least two separate computers, each having the software necessary to carryout key business processes installed and configured. At least one of the computer systems must be a laptop computer and this laptop computer must remain accessible to the primary and secondary traders at all times including vacations. Software currently identified as being necessary for key business processes to continue includes:

- Saratoga Capital: Trade order execution
- ESignal Pro: End of day data collection
- ESignal Pro: Real-time market data and news
- MetaStock software: Trade identification and asset allocation
- Web Browser: Access to remote back-up facility and e-mail back-up



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Data Feed Redundancy

Each office location must maintain at least two data feeds. Data feed redundancy is required to ensure that if any one data provider should experience an outage that market data remains available for trading and market monitoring purposes. Redundancy is currently provided via the following mechanisms at each office location:

- ESignal Pro: Real-time quotes and charting
- ESignal Pro: End-of-day data collection
- MetaStock: tick data and end-of-day data
- Saratoga Capital: Real-time quotes, verbal (212) 422-1760

Availability of Trade Desk

In the event that the back-up contingencies described above should fail, the Trader immediately responsible for the management of the portfolio may leverage Saratoga Capital trade desk to place orders, execute trades and obtain market quotes. Saratoga Capital trade desk can be reached at (212) 422-1760.

Final Stop Gap

If all contingencies fail and the entire Senior Leadership Team are simultaneously incapacitated, all market positions must be immediately liquidated and assets dispersed to clients. In such an event the following people need to be immediately informed of the circumstance and requested to execute the following activities:

- Trade Liquidation: Jim Zurlo, Saratoga Capital, (212) 422-1760.
- Asset Disbursement: (custodian).
- Closing of LP and Compliance Procedures:
- Final Audit and Tax Preparation:

Procedures

In the event of a system outage, office outage, and/or incapacitation of any key team member the following procedure should be executed (see the section “Resources” for phone number, e-mail addresses and URLs):

1. Each Managing Member must be immediately notified.
2. The next Trader in succession will assume responsibility for all trading activities via his or her primary computer system or back-up portable system until the Primary Trader is able to reestablish connectivity and resume trading activities.
3. If all traders are simultaneously incapacitated the following individuals must be immediately contacted and asked to execute trade liquidation: Jim Zurlo, Saratoga Capital, (212) 422-1760.