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The **401(k) Optimizer®** is a web-based tool designed to help you with your company-sponsored retirement plan, such as a 401(k), 403(b), or 457. This tool allocates your investments based on your risk tolerance level and long-term goals. We overlay your investments with signature *stoploss* protection called the HCM-BuyLine®, a mathematical indicator designed to calculate trends in the market. The HCM-BuyLine® helps the 401(k) Optimizer® manage risk by indicating when it's time for you to move your investments to cash or more conservative investments.

How the 401(k) Optimizer® Works

1

Sign up online at www.401koptimizer.com

Enter your information in the secure online sign up form, connect to your financial institution, and upload your retirement plan fund choices.



2

Answer a few questions about your investment personality

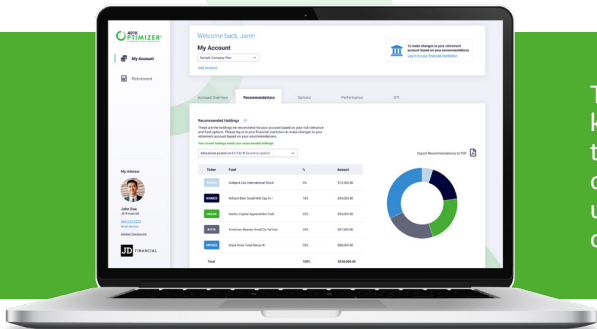
Once you complete the risk tolerance questionnaire, the system thoroughly analyzes the choices in your employer's retirement plan to generate your personalized recommendations.



3

Receive an email when your customized recommendations are ready

Login to your account and view your recommendations. The system tells you which specific funds to choose in your employer's plan, how much to invest in each fund and when to rebalance your account.



The 401(k) Optimizer® offers tailored, nonemotional advice to help individuals like you know what investments to buy, when to buy them and when to sell them, in an attempt to optimize returns in your retirement plan. After your initial recommendations, you'll continue to receive ongoing advice on managing your account including quarterly updates and guidance on what to do during market ups and downs. You will receive clear advice on how to restructure your portfolio in an attempt to protect your assets.

401(k) Optimizer® Disclosures

HCM is registered with the SEC and only transacts business where it is properly registered or is otherwise exempt from registration. SEC registration does not constitute an endorsement of the firm by the Commission nor does it indicate that the advisor has attained a particular level of skill or ability. The 401(k) Optimizer® is a web-based tool intended to help clients invest in their employer's 401(k) or similar defined contribution plan. Clients receive professional recommendations from the 401(k) Optimizer® and maintain total control over their personal accounts. The goal is to reduce risk by taking proactive measures with company-sponsored retirement plans. Changes in investment strategies, contributions or withdrawals may materially alter the performance, strategy and results of your portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment (including the investments and/or investment strategies recommended by the advisors), will be equal to past performance level, equal any corresponding indicated historical performance level(s), be suitable for your portfolio or individual situation, or be profitable for a client's portfolio. Past performance does not guarantee future results. All investment strategies have the potential for profit or loss. Economic factors, market conditions, and investment strategies will affect the performance of any portfolio and there are no assurances that it will match or outperform any particular benchmark for measuring the performance of a portfolio. Changes in investment strategies, contributions or withdrawals, and economic conditions may materially alter the performance of your portfolio. Different types of investments involve varying degrees of risk, and there can be no assurance that any specific investment or strategy will be suitable or profitable for an investor's portfolio. Account information has been compiled solely by Howard Capital Management and has not been independently verified. Historical performance results for investment indexes and/or categories have been provided for general comparison purposes only and generally do not reflect the deduction of transaction and/or custodial charges or the deduction of an investment-management fee, the incurrence of which would have the effect of decreasing historical performance results. There are no assurances that a portfolio will match or outperform any particular benchmark.

HCM Indicator. The HCM-BuyLine® (the "Indicator") is a proprietary indicator used to assist in determining when to buy and sell securities. When the Indicator identifies signs of a rising market, HCM then identifies the particular security(ies) that HCM believes have the best return potentials in the current market from the universe of assets available in each given model and signals to invest in them. When the Indicator identifies signs of a declining market, the Indicator signals to move clients' investments to less risky alternatives. Not every signal generated by the Indicator will result in a profitable trade. There will be times when following the Indicator results in a loss. An important goal of the Indicator is to outperform the market on a long-term basis. The reason is the mathematics of gains and losses. A portfolio which suffers a 30% loss takes a 43% gain to return to the previous portfolio value. The Indicator is reactive in nature, not proactive. It is not designed to catch the first 5-10% of a bull or bear market. Ideally, it will avoid most of the downtrends and catch the bulk of the uptrends. There may be times when the use of the Indicator will result in a loss when HCM re-enters the market. Other times there may be a modest positive impact. When severe downtrends occur, however, such as in 2000-2002 and 2007-2008, the Indicator has the potential to make a significant difference in portfolio performance. Naturally, there can be no guarantee that the Indicator will perform as anticipated. The Indicator does not generate stop-loss orders that automatically sell securities in the portfolio at a certain price. As a result, use of the Indicator will not necessarily limit your losses to the desired amounts due to the limitations of the Indicator, market conditions, and delays in executing orders.

All photos were used to enhance this website. None of them are photographs of current or former clients.

Howard Capital Management offers its investment methodology through multiple programs that may invest in exchange traded funds, variable annuities and mutual funds. There is no certainty that any investment or strategy (including the investments and/or investment strategies recommended by the advisor), will be profitable or successful in achieving investment objectives. Please work with your financial advisor to determine which investment program is consistent with your financial objectives and risk tolerance. The HCM Optimized Trend Indicator ("OTI") is a tool developed by Howard Capital Management, Inc. ("Howard"), an SEC-registered* investment adviser, to help assist a subscriber to determine what portion, if any, of the subscriber's company stock should be bought, sold or held in the subscriber's retirement portfolio as of a particular date. Subscriber maintains absolute discretion as to whether or not to follow the OTI. It remains the subscriber's exclusive responsibility to review and evaluate the OTI and his/her company stock and to determine whether to accept or reject any recommendation and to correspondingly determine whether any OTI recommendation is appropriate for his/her financial situation, or investment objective. The subscriber acknowledges and understands that the OTI is an opinion only, based upon HCM's judgment as of a particular date. That opinion could be wrong. In addition, due to various factors, including changing market conditions and/or applicable laws, the OTI may no longer be reflective of current opinions or positions. No current or prospective subscriber should assume that investment in, or purchase and sale of, his/her company stock based upon the OTI will be profitable for his/her account. Individual equities such as the subscriber's company stock are not diversified positions and may be subject to high levels of volatility and principal risk. Howard does not offer or provide investment implementation services, nor does it offer or provide initial or ongoing individual personalized OTI advice (neither in person nor via the Internet) to Optimizer subscribers. Howard will not have and will not accept any trading authority for the subscriber's account. Thus, it shall always remain the subscriber's exclusive responsibility to review and evaluate the OTI and to determine whether to accept or reject any OTI recommendation. If accepted, the subscriber maintains exclusive responsibility for the initial and ongoing implementation and monitoring of any such accepted recommendation.

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Financial Advisor Disclosures: