New Constructs[®]

CGMRX - Very Dangerous Rating CGM Trust: CGM Realty Fund

★☆☆☆☆ Predictive Rating

Very Dangerous

Very Dangerous

Neutral

★☆☆☆☆ Portfolio Management
★★★☆☆ Total Annual Costs

Investment Recommendation

- · We strongly recommend investors avoid CGMRX.
- Despite strong past performance, we expect the fund to significantly underperform the market.
- CGMRX's Portfolio Management rating does not justify its high Total Annual Costs.

Portfolio Management Rating Details

- CGMRX receives our Very Dangerous rating because it overweights Dangerous-or-worse-rated stocks.
- REM, CGMRX's benchmark, receives our Neutral rating and holds better stocks than the fund.
- Our fund analytics are based on aggregating our models and ratings for each fund's holdings.
- Our top-ranked stock ratings leverage key data from the financial footnotes for unrivaled research quality.

Predictive Ratings enable smarter investing by assessing the key drivers of fund performance.

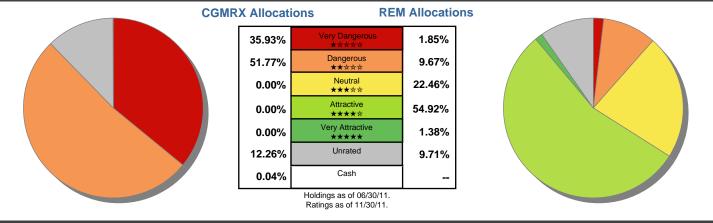
• Stock-picking (Portfolio Management) and fund expenses (Total Annual Costs) drive investment performance.

Fund Rankings

- 3rd percentile of the 4700+ equity funds we cover.
- 1 out of 1 Financials / REIT funds.
- All 2 ETFs in the same category rank better.

| Portfolio Management Rating Breakdown | | | | | |
|---------------------------------------|-----------------------------------|------------|--|--|--|
| Business Strength | | | | | |
| ★★☆☆☆ | Quality of Earnings | Dangerous | | | |
| ★★☆☆☆ | Return on Invested Capital (ROIC) | 5.32% | | | |
| Valuation | | | | | |
| ★★☆☆☆ | Free Cash Flow Yield | -1.55% | | | |
| \star \bigstar $\&$ $\&$ $\&$ | Price to Economic Book Value | 6.35 | | | |
| \star \$\$\$\$\$\$\$ | Market-Implied Duration of Growth | 101 years | | | |
| Fund Asset A | llocation | | | | |
| ***** | Cash Allocation | 0.04% cash | | | |

Allocation Details: Fund vs Benchmark - iShares FTSE NAREIT Mortgage REITs Index Fund (REM)



Active Management Commentary

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• CGMRX allocates 87.70% of its value to Dangerous-or-worse-rated stocks while REM allocates 11.52%.

• CGMRX allocates 0.00% of its value to Attractive-or-better-rated stocks while REM allocates 56.30%.

- Investors should expect funds with higher Total Annual Costs to allocate more value to Attractive and Very Attractive Stocks and less to Dangerous and Very Dangerous stocks than alternative funds with lower costs.
- Active portfolio management of CGMRX does not add value versus its ETF benchmark REM.

| Return - An | nual | Top 5 Holdings | | Key Mutual Fu | y Mutual Fund Statistics | | |
|---|--|-----------------------------|---------------------------------|--|--|---|---|
| Year to Date 1 Year 3 Year 5 Year Inception | -2.26% 4.89% 26.06% 3.78% 15.62% | Host Hotels and Resorts Inc | SPG CBG SLG HST EQR | Net Assets(mm) NAV Benchmark # of Holdings Initial Minimum | \$1,556.10 \$26.03 REM 20 \$2,500.00 | Category Mgmt Co Manager Tenure Inception | Financials / REIT Capital Growth Management LP G. Kenneth Heebner 1994 05/13/94 |
| Data from Lipper, a Thomson Reuters Company, and New Constructs, LLC. Details on Total Annual Costs Rating are on page 2. | | | | | | | |

PREDICTIVE FUND RATING

12/01/11 NAV as of 11/30/11: \$26.03



<u>New Constructs[®]</u>

PREDICTIVE FUND RATING

12/01/11

Total Annual Costs Rating and Ranking

| Rating | Total Annual Costs | Fund Universe % Rank | Category Rank |
|--------|-----------------------|-------------------------|---------------|
| ★★★☆☆ | 1.59% | 62.20% | 1 of 1 |

This rating reflects all expenses, loads, fees, and transaction costs in a single value that is comparable across all funds.

Total Annual Costs Breakdown

| | Annualized Values | | | |
|--------------------|-------------------|----------------|--|--|
| All Cost Types | CGMRX | Benchmark: REM | | |
| Front-End Load | 0.00% | | | |
| Expense Ratio | 0.99% | 0.53% | | |
| Back-End Load | 0.00% | | | |
| Redemption Fee | 0.00% | | | |
| Transaction Costs | 0.60% | | | |
| Total Annual Costs | 1.59% | 0.53% | | |

 To justify its higher Total Annual Costs, CGMRX must outperform its ETF benchmark by 1.13% annually over 3 years or 1.13% annually over 10 years.

- This analysis assumes a 3-year holding period, the average for all funds.
- Transaction costs are estimated using the fund's annual portfolio turnover ratio of 133%.

Overview of Our Predictive Mutual Fund Rating System

New Constructs' <u>Predictive Fund Ratings</u> enable smarter investing by assessing the key drivers of future fund performance. We start by analyzing every fund holding based on New Constructs' stock ratings, which are regularly featured as among the <u>best by Barron's</u>. Next, we measure and rank the all-in costs of investing in a fund.

Intuitively, there are two drivers of future fund performance.

- 1) New stock-picking (Portfolio Management Rating) and
- 2) Fund expenses (Total Annual Costs Rating) drive investment performance

The figure below details the criteria that drive our Predictive Rating system for funds. The two drivers of our predictive rating system are Portfolio Management and Total Annual Costs. The Portfolio Management Rating (details <u>here</u>) is the same as our Stock Rating (details <u>here</u>) except that we incorporate Asset Allocation (details <u>here</u>) in the Portfolio Management Rating. The Total Annual Costs Rating (details <u>here</u>) captures the all-in cost of being in a fund over a 3-year holding period, the average period for all mutual fund investors.

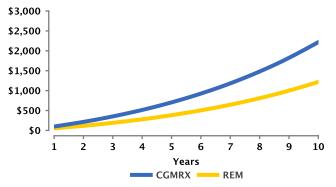
| | Portfolio Management Rating | | | | | | |
|-------------------------|-----------------------------|-------------------------------|-----------|-----------------------------|-------------------------------|------------------|------------------------------|
| Predictive Rating | Business Strength | | Valuation | | | Asset Allocation | Total Annual Costs Rating |
| Ū | Quality of Earnings | Return on Invested Capital | FCF Yield | Price to Econ Book Value | Mkt-Imp Duration of Growth | Cash % | |
| Very Dangerous ★☆☆☆☆ | Misleading Trend | Bottom Quintile | < -5% | > 3.5 or -1 < 0 | > 50 | > 20% | > 4% |
| Dangerous ★★☆☆☆ | False Positive | 4th Quintile | -5% < -1% | 2.4 < 3.5 or < -1 | 20 < 50 | 8% < 20% | 2% < 4% |
| Neutral ★★★☆☆ | Neutral EE | 3rd Quintile | -1% < 3% | 1.6 < 2.4 | 10 < 20 | 2.5% < 8% | 1% < 2% |
| Attractive ★★★★ | Positive EE | 2nd Quintile | 3% < 10% | 1.1 < 1.6 | 3 < 10 | 1% < 2.5% | 0.5% < 1% |
| Very Attractive ★★★★ | Rising EE | Top Quintile | > 10% | 0 < 1.1 | 0 < 3 | < 1% | < 0.5% |

Reported Costs vs Benchmark: as of 05/01/11

| | CGMRX | Benchmark: REM |
|----------------|-------|----------------|
| Front-End Load | 0.00% | |
| Expense Ratio | 0.89% | 0.48% |
| Back-End Load | 0.00% | |
| Redemption Fee | 0.00% | |

Accumulated Total Costs vs Benchmark

Accumulated Total Costs represent the dollar value of costs investors incur during a 10-yr holding period. Assumes a \$10,000 investment and a 10% annual return for the fund and its benchmark.



 3-year Accumulated Total Costs are \$352.22 for CGMRX and \$190.75 for REM. 10-year Accumulated Total Costs are \$2,218.14 for CGMRX and \$1,218.45 for REM.

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New Constructs® - Profile

Incorporated in July 2002, <u>New Constructs</u> is an independent publisher of investment research that provides clients with consulting, advisory and research services. We specialize in quality-of-earnings, forensic accounting and discounted cash flow valuation analyses for all U.S. public companies.

How New Constructs Creates Value for Clients

- 1. Superior Recommendations Our <u>stock-picks</u> consistently outperform. See our track record in our <u>stock-picking accolades</u> and <u>Proof Is In</u> <u>Performance</u> reports.
- 2. More Accurate Research Our <u>patented Research Platform</u> for <u>reversing accounting distortions</u> and <u>discounted cash flow analysis</u> leverages better data to deliver smarter research.
- 3. **Time Savings** We check the fine print in thousands of corporate filings so you don't have to. As reported by <u>Barron's</u>, our expertise in analyzing SEC filings delivers <u>Hidden Gems and Red Flags</u> that drive long-term stock-picking success.
- 4. **Transparency** We are proud to share the results of our analysis of over 50,000 10-Ks. See the <u>Corporate Disclosure Transgressions</u> report we provided to the SEC. Our reports detail all data and assumptions. Company Models enable users to change them.
- 5. **Objectivity** New Constructs is an independent research firm, not tied to Wall Street or investment banking services. See our presentation to the Senate Banking Committee, the SEC and many others in DC.

Our Philosophy About Research

Accounting data is not designed for equity investors, but for debt investors. <u>Accounting data must be translated into economic earnings</u> to understand the profitability and valuation relevant to equity investors. Respected investors (e.g. Adam Smith, Warren Buffett and Ben Graham) have repeatedly emphasized that accounting results should not be used to value stocks. <u>Economic earnings</u> are what matter because they are:

- 1. Based on the complete set of financial information available.
- 2. Standard for all companies.
- 3. A more accurate representation of the true underling cash flows of the business.

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