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*Alpha Performance Verification Services*

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**Independent Verifier's Report**

Focused Growth Investor Newsletter  
PDM Investment Services, LLC  
5131 Standish Drive  
Troy, Michigan 48085

We have examined the accompanying Schedule of Investment Performance Returns and the Notes to the Schedule of Investment Performance Returns for the **Focused Growth Investor Diversified Mutual Fund & Sector Portfolio – Moderate** for the period January 1, 2011 through December 31, 2019. The Schedule of Investment Performance Returns and Notes to the Schedule of Investment Performance Returns are the responsibility of management. Our responsibility is to express an opinion on this performance presentation based on our examination.

Our examination included examining evidence supporting the Schedule of Investment Performance Returns and Notes to the Schedule of Investment Performance Returns for the **Focused Growth Investor Diversified Mutual Fund & Sector Portfolio – Moderate** and performing other procedures, as we considered necessary in the circumstances. Our examination included procedures to obtain assurance that performance results reflected in the Schedule of Investment Performance Returns were calculated using consistent methodologies as outlined in the Notes to the Schedule of Investment Performance Returns. We believe our examination provides a reasonable basis for our opinion.

In our opinion, the schedules referred to above present, in all material respects, the performance record of the **Focused Growth Investor Diversified Mutual Fund & Sector Portfolio – Moderate** based on the calculation methodologies set forth in the Notes to the Investment Performance Schedule of Returns. The Schedule of Investment Performance Returns and Notes to the Investment Performance Schedule of Returns are an integral part of this opinion.

A handwritten signature in black ink that reads "Alpha Performance Verification".

Michael W. Hultzapple, CFA, CPA, CIPM  
Alpha Performance Verification Services  
January 9, 2020

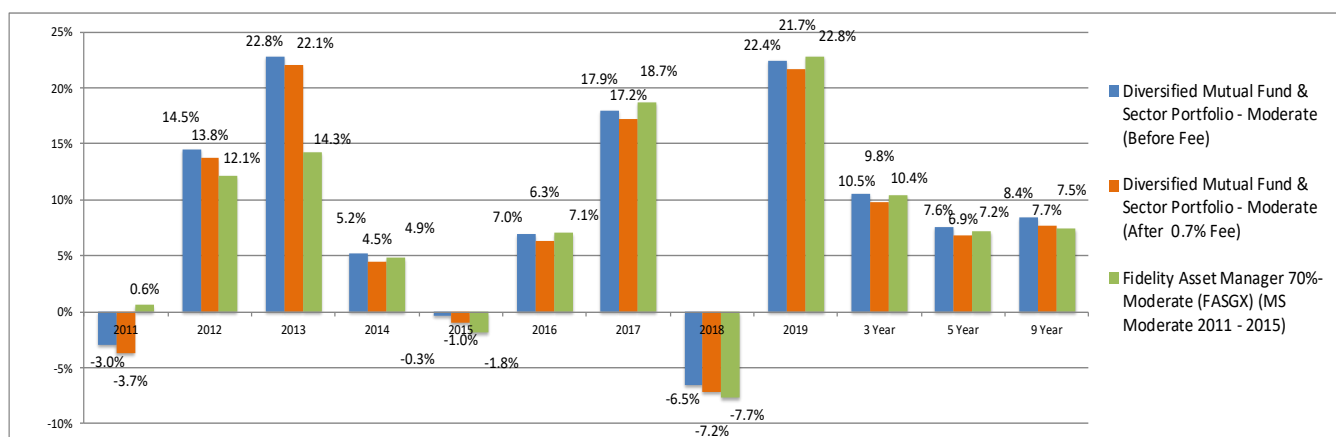
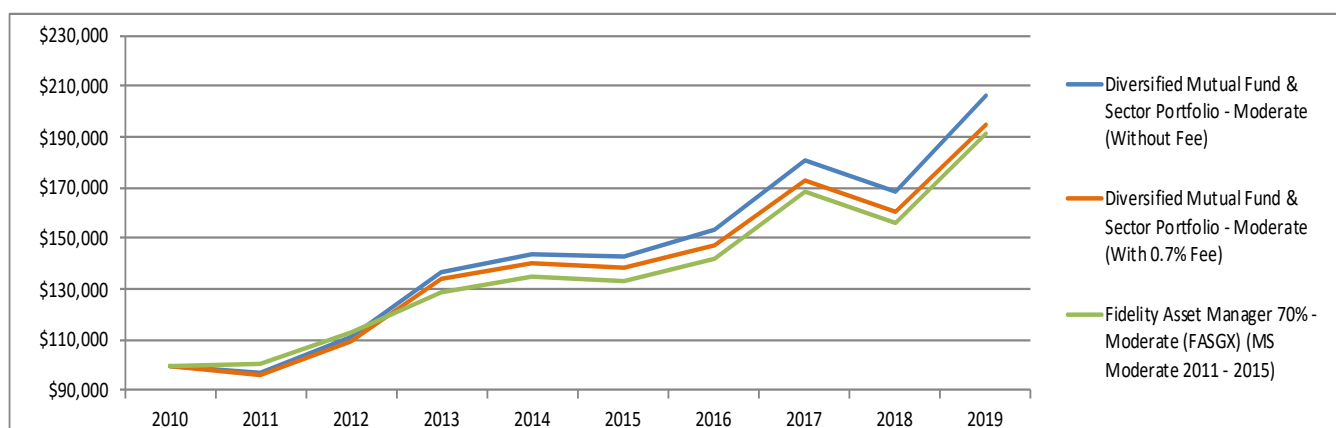
## Focused Growth Investor Diversified Mutual Fund & Sector Portfolio – Moderate

### Schedule of Investment Performance Returns

As of December 31, 2019

PDM PORTFOLIO ANNUAL RETURNS	2011	2012	2013	2014	2015	2016	2017	2018	2019
Diversified Mutual Fund & Sector Portfolio - Moderate (Before Fee)	-3.0%	14.5%	22.8%	5.2%	-0.3%	7.0%	17.9%	-6.5%	22.4%
Diversified Mutual Fund & Sector Portfolio - Moderate (After 0.7% Fee)	-3.7%	13.8%	22.1%	4.5%	-1.0%	6.3%	17.2%	-7.2%	21.7%
Fidelity Asset Manager 70%-Moderate (FASGX) (MS Moderate 2011 - 2015)	0.6%	12.1%	14.3%	4.9%	-1.8%	7.1%	18.7%	-7.7%	22.8%

PDM PORTFOLIO ANNUALIZED RETURNS	3 Year	5 Year	9 Year
Diversified Mutual Fund & Sector Portfolio - Moderate (Before Fee)	10.5%	7.6%	8.4%
Diversified Mutual Fund & Sector Portfolio - Moderate (After 0.7% Fee)	9.8%	6.9%	7.7%
Fidelity Asset Manager 70%-Moderate (FASGX) (MS Moderate 2011 - 2015)	10.4%	7.2%	7.5%



Starting in 2016, the benchmark changed from the Morningstar Moderate Target Risk Benchmark to the Fidelity Asset Manager 70% (FASGX) because Morningstar modified their benchmark structure and to align with the risk profile table.

Please see attached Notes to Schedule of Investment Performance Returns.

## ***Focused Growth Investor Diversified Mutual Fund & Sector Portfolio – Moderate***

### **Notes to Schedule of Investment Performance Returns**

**As of December 31, 2019**

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#### 1. Organization

PDM Investment Services, LLC is a Registered Investment Advisor located in Troy, Michigan. The services offered are the Focused Growth Investor Newsletter, Portfolio Management and Portfolio Analysis & Design. The Focused Growth Investor is a subscription based monthly investment newsletter. ***The Focused Growth Investor Diversified Mutual Fund Portfolio & Sector Portfolio – Moderate*** is the most commonly recommended portfolio.

#### 2. Focused Growth Investor Diversified Mutual Fund & Sector Portfolio - Moderate

Our examination of the ***Focused Growth Investor Diversified Mutual Fund & Sector Portfolio - Moderate*** actual account began on January 1, 2011. The portfolio is comprised of no-load active managed mutual funds, exchange traded funds and money market funds.

#### 3. Calculation Of The Time-Weighted Rates Of Return

The performance of the portfolio returns has been prepared using consistent industry accepted methodologies. The returns are calculated using monthly account brokerage statements taking into account any cash received or distributed. The returns include dividends, distributed capital gains, transaction costs and other custodial or brokerage expenses. Performance returns are calculated before our portfolio management fee and after a portfolio management fee of 0.7% annually for an average household portfolio of \$685,000 Assets Under Management (AUM). Portfolio management fees vary from 1.0% of \$100,000 AUM to 0.7% of \$1,500,000 AUM. Historical rates of return may not be indicative of future rates of return. The rate of return parameters used by management is as follows

- The Diversified Mutual Fund & Sector Portfolio inception date is January 1, 2011 for the actual account.
- Returns are presented including transactions fees and with and without portfolio management fees.
- The portfolios are rebalanced as often as monthly and at least annually depending on investment recommendations of the Focused Growth Investor Newsletter.
- The Diversified Mutual Fund & Sector Portfolio has not received or distributed cash to this point. All realized and unrealized profits and losses remain in the portfolio. In the future the portfolio may receive or distribute cash, which will be included in calculating returns.
- Dividends received by the portfolios are reinvested in same security that issued the dividend or cash into the portfolio or other securities to get to the recommended asset allocation.
- The portfolio is valued as of the last trading day of each month.
- Returns are calculated using a time-weighted methodology.
- Annual returns are calculated by geometrically linking the monthly

#### 4. Other Notes

- Performance returns of the Morningstar Moderate Target Risk Benchmark and the Fidelity Asset Manager 70% are shown for general industry-wide comparative purposes and are available on [www.morningstar.com](http://www.morningstar.com). It should not be assumed that the benchmark represents a similar investment strategy or asset class as the ***Focused Growth Investor Portfolios***.
- It should not be assumed that all clients follow the ***Focused Growth Investor Portfolios***. Client investments are made with their investment objective, risk tolerance and income needs in mind.
- Past performance is not indicative of future performance. Market and economic conditions have the largest impact on a portfolio's performance. Strategies can go in and out of favor in different market environments. Some periods will see losses. Investment strategies evolved over the past and will continue to evolve in the future. Client investment results may vary from the model due to the timing of implementation, implementation transaction fees, portfolio size, risk profile and actual investments.
- The Independent Verifier's Report and the Schedule of Investment Performance Returns are an integral part of this presentation.