Quarterly Report

October 29, 2010

Roumell Asset Management, LLC

Third Quarter Summary

Performance Summary

	Annualized as of 9/30/10							Total Return
	3Q 2010	YTD	1 Year	3 Year	5 Year	10 Year	Since Inception*	Since Inception*
Roumell Equity (Net)	**7.10%**	**7.85%**	**15.59%**	**1.28%**	**4.56%**	**8.24%**	**11.20%**	**248.20%**
S&P 500	11.29%	3.89%	10.16%	-7.16%	0.64%	-0.43%	1.15%	14.32%
Russell 2000	11.29%	9.12%	13.35%	-4.29%	1.60%	3.99%	5.47%	86.88%
Russell 2000 Value	9.72%	7.92%	11.84%	-5.00%	0.73%	7.71%	7.55%	135.32%
Roumell Balanced (Net)	**6.04%**	**6.78%**	**11.76%**	**1.07%**	**3.47%**	**6.59%**	**8.13%**	**150.57%**
Thomson US Bal Index	8.34%	5.25%	9.18%	-2.21%	2.30%	2.09%	2.79%	38.25%
Roumell Fixed Income (Net)	**3.58%**	**6.74%**	**9.42%**	**N/A**	**N/A**	**N/A**	**24.80%**	**47.36%**
Barclays US Aggregate Bond	2.48%	7.94%	8.16%	N/A	N/A	N/A	7.96%	14.35%
Barclays US Corp Hi Yield	6.75%	11.56%	18.48%	N/A	N/A	N/A	38.36%	76.50%

**Inception of Roumell Equity and Roumell Balanced is 1/1/99. Inception of Roumell Fixed Income is 1/1/09.*

Roumell Asset Management, LLC has prepared and presented this report in compliance with the Global Investment Performance Standards (GIPS®). Ashland Partners & Co. LLP, our independent verifier, completed its examination of the composite performance returns for the period of 1999 (inception) through June 30, 2010. All returns include reinvested dividends and interest. Please refer to the annual disclosure presentations at the end of this letter.

Our third quarter and year-to-date returns were accomplished with roughly 40% of firm assets invested in higher yielding corporate bonds, 35% in equities, and the remaining 25% held in cash equivalents. On a risk-adjusted basis, we are satisfied with our returns.

Buy and Hold?

During the stock market's bull run from August 1982 until March 2000, the S&P 500 had a stunning annual return of 19.22%. It became widely accepted that investors ought to simply buy stocks, sit tight, and let the returns roll in. In fact, this period's market return was driven largely by the hyper-return between January 1, 1995 and March 31, 2000: 26.5% annually on the S&P 500. A tremendous body of literature has, in our view, incorrectly weighted this history and argued that investors ought to simply buy and hold stocks. This idea has been forcefully put forth even in the face of extended periods of zero-to-low returns from such an approach. In reality, the picture is complicated and does not lend itself to easy one-line investment mantras.

Many in the financial services industry selling the perpetual attractiveness of stocks are keen to point out the long-term rate of return on stocks: since January 1926, the S&P 500 has returned 9.66% a year, inclusive of dividends (Ibbotson Associates). Not bad, particularly if you have a very long time horizon. As Mark Twain quipped, "Get your facts first, and then you can distort them as much as you please."

However, lengthy periods of return drought are common in equity investing. First, the period of '82 to

2 Wisconsin Circle, Suite 660 • Chevy Chase, Maryland 20815 • P: 301-656-8500 F: 301-656-8501 • www.roumellasset.com

’00 referenced earlier was an absolute anomaly. A generation of investors before, having parked money in the stock market from 1964 to 1974, witnessed an annual return of only 1.6%. Ten-year Treasury bonds returned 3.38% during the same period. Similarly, the past ten years have yielded an annual rate of return of *negative* 0.4% through September 30, 2010. The ten-year Treasury annual rate of return during this period was 7.08%.

In fact, when viewing every rolling five-year period since January 1, 1926 (beginning in each of the 958 months during this period), nearly 30% yielded less than a 5% annual rate of return. Further, the data show that whether the holding period was three, five, or ten years, only about 60% of such periods yielded an annual return of 8% or greater. Moreover, in 53% of the 898 ten-year periods since 1926, investors *did not* actually receive the often quoted 10% equity annual rate of return. Thus, the general assumption heralded by the mainstream financial services industry that the investing public can blithely drop money in the stock market and earn a roughly 10% annual rate of return is not supported by the data.

Nonetheless, buy and hold adherents have arguments. The odds of achieving a positive return are squarely in the favor of long-term equity investors. For instance, 94% of the 898 ten-year periods since 1926 netted a positive investment result. Further, 82% of the 982 three-year periods and 87% of the 958 five-year periods resulted in a positive return. This strongly supports the idea that if an investor holds a broad portfolio of U.S. stocks for a considerable period, he or she is unlikely to lose money.

S&P 500 Monthly Rolling Performance (1/1/1926 – 9/30/2010)

Number of Results	3 YEAR 982	5 YEAR 958	10 YEAR 898
Percent of Results Positive	82.3%	87.2%	93.7%
Percent of Results > 5% Annual Return	73.0%	72.8%	79.3%
Percent of Results > 8% Annual Return	62.3%	61.1%	58.5%
Percent of Results > 10% Annual Return	53.2%	49.4%	47.3%

Compiled from online data of Robert Shiller; www.econ.yale.edu/~shiller/data.htm

In our minds, the table above raises a few questions. First, if a roughly 40% chance exists that an investor will earn less than an 8% rate of return, shouldn’t a credit instrument that pays 8% and is deemed “money good” be considered a strong alternative to receive a capital commitment? Second, is there a more *active* investment stance than strict buy and hold that does not claim to make market predictions, but instead sensibly pays strict attention to price in order to minimize investment losses? We believe the answer to both questions is “yes.”

Jeremy Siegel helped provide the intellectual underpinning to buy and hold when he published *Stocks for the Long Run* in January 1994. Since its publication, the S&P 500 has returned roughly 7.1% annually inclusive of dividends. Later in this letter, we highlight a recent bond purchase, Helix Corporation, wherein we locked in a 9.5% yield for five and a half years in what we believe is a very strong “money good” credit. Which is the better investment: 9.5% “money good” or stock market optionality? Not shown in any long-term stock market data returns are the sometimes gut-wrenching market swoons that investors must endure for that return. To wit, there have been *two* 50% market drops in the past ten years.

Interestingly, value investors are often among the strictest adherents to a buy and hold philosophy even though their intellectual inspiration comes from a man, Benjamin Graham, who was more nuanced on the subject and placed his emphasis on price, not holding period. In various editions of *The Intelligent Investor,* Graham provided views on market levels. He thought that the “market level [was] favorable for

investment in 1948 and 1953" but "dangerous" in 1959 and "too high" in 1964. Looking at valuations in 1964, Graham was clear: "Speaking bluntly, if the 1964 price level is not too high, how could one say that any price is too high?" Regarding the market in 1972, he said it was "unattractive from the standpoint of conservative investment." Thus, Graham, the father of a bottom-up, company focused investment process, paid attention to overall market valuation levels. That said, Graham was first and foremost a bottom-up investor and believed that a "consistent and controlled common stock policy" was superior to market and/or economic judgments. Graham's nuance was reflected in his belief that stocks ought to represent between 25% (low side) and 75% (high side) of an investor's portfolio based on relative attractiveness. In essence, he argued that price should be the chief determinant of portfolio allocation.

History has not been kind to those willing to ignore price. Jeffrey Applegate, former chief investment strategist at Lehman Brothers, said the following in the April 10, 2000 edition of *BusinessWeek:* "Is the stock market riskier today than two years ago simply because prices are higher? The answer is no." The market was priced at 43x earnings (based on Robert Shiller's price-to-earnings (P/E) ratio calculation using trailing ten years data) and total market capitalization stood at 185% of GDP. Today, ten years later, the Dow Jones Industrial Average is still below the level where it stood when the chief strategist of one of Wall Street's most sophisticated firms spoke those words.

At today's market level, we note two valuation metrics. First, the S&P 500 now stands at 21x earnings (using Shiller's P/E methodology). The median P/E is 16x dating back to 1926; 14x for the period prior to 1982 and 21x since 1982. (Graham believed that it was plain wrong to use trailing twelve months or next twelve months data, and instead argued that corporate profits ought to be viewed in the context of a business cycle.) Second, according to Federal Reserve data, the overall public stock market is now priced at roughly 100% of GDP, a 33% premium to the past fifty years' median level of 75%. For us, this data is informative, but not decisive. In other words, with patience and effort, we should still be able to identify specific price/value discrepancies even though not much "low-hanging fruit" is currently available, in our opinion.

Market enthusiasts can rightly point to a forward price-to-earnings market ratio of 12x on the S&P 500: $95 estimated 2011 earnings divided by a current index of roughly 1,175. However, the $95 is predicated on a net earnings margin of 9.5% versus a historical median closer to 7.5%. In fact, next year's earnings estimate is based on 25% earnings growth (compared to 2010), but only 8% revenue growth, reflecting how much of next year's corporate earnings is coming from margin expansion. Historically, profit margins have shown a strong tendency to revert to the mean because that's what takes place in capitalism. Additionally, there is little question that in today's low interest rate environment, equities may well continue to capture investors' attention.

The discussion here should in no way be viewed as an argument that we, or anyone else, can predict aggregate stock market movements in the short or medium term. Nor should it be construed that we are tending away from stocks. Here is what we are saying:

- Long-term stock market returns often trumpeted by the financial services industry mask a much more complicated intraperiod return reality.
- Price is the investor's best friend, not holding period.
- Some market environments offer better value than others.

An Alternative to Buy and Hold — Opportunistic Capital Allocation

Opportunistic capital allocation (OCA) offers us the flexibility to exercise commonsense judgment. First, although the press headlines are dedicated to the stock market's daily activities, we believe that,

at times, corporate bonds can provide a superior risk-adjusted return given their senior position in a company's capital structure. Second, we believe that when a company's price begins to approach a conservative estimate of its intrinsic value, the security ought to be sold, period. We manage business, economic, and market risk by being price conscious not just at the point of purchase, but throughout our holding period. Such price consciousness necessitates both harvesting gains and minimizing losses. In this regard, we are different from traditional deep value investors that place a strict emphasis on buy and hold.

Finally, our company-specific decision-making process makes the buy and hold debate less relevant to us since the debate is really a broad market discussion. We are not buying "the market." Instead, our focus is on a rigorous analysis of a specific company's assets, earnings power, and possible conversion events *in light of a particular price*. Market levels may tell us the odds of finding suitable investment candidates, but they do not serve as investable ideas in and of themselves. Later in this letter, we discuss our recent investment in Cogent, which was acquired by 3M subsequent to our purchase and well illustrates our efforts to be in front of technology merger and acquisition trends (in part the result of huge corporate cash balances that are earning nearly zero) that occur more or less independent of the public stock market.

In our view, no asset—equity, debt, real estate, or commodity—possesses inherent investment merit independent of the price paid to own it. We are content and committed to sitting perfectly still in the absence of what we believe are high margin of safety situations; i.e., clear and significant price/value discrepancies. We will continue to visit companies, interview key industry contacts, and leverage all available resources to identify investment candidates that we feel offer compelling risk/reward characteristics. **Make no mistake: we are passionate about equity investing and the outsized gains that are available when finding companies that possess hidden assets, resource conversion possibilities, or that stand in front of strong business, industry, or secular growth trends. However, it is imperative to be highly price conscious in our pursuits.**

We are pleased to announce that Sherita Morris joined our team in August as an administrative assistant. Sherita has extensive experience in office management, project management, financial management, and customer service with various firms in Washington, DC. We feel fortunate to have found such a talented individual.

Our Top Purchases

Helix Energy Solutions Group, Inc. 9.5% 1/15/16 Bonds. Helix is both an offshore marine contractor servicing the oil and gas exploration and development industry and an owner/operator of oil and gas reserves located in the Gulf of Mexico. Helix's marine contracting business is involved in numerous subsea activities such as installing pipelines; inspection, repair, and decommissioning services for production platforms; and well plugging and abandonment services. Helix also owns interests in several offshore production platforms that serve as hubs for the collection, processing, and transportation of oil and gas from offshore wells to onshore refineries and distribution facilities.

We purchased Helix bonds because of their compelling 9.5% yield-to-maturity for five-and-a-half-year paper. Helix is a classic sum-of-the-parts asset valuation given its three distinct businesses. The sum of Helix's parts comes to about $2.5 billion of asset value: marine contracting business at $950 million at 6x EBITDA estimates; oil and gas reserves at just over $1 billion based on a private market value of $2.50/Mcfe; and $400 million for the company's production facilities (a 25% discount to the company's cost basis in the hubs). As of June 30, 2010, Helix had $1.3 billion of net debt including the present value

of future asset retirement obligations from producing wells in the Gulf of Mexico. With almost 2x asset value to net debt, the bonds provide a particularly attractive investment given the contractual strength of the security. Helix has a public equity market capitalization of just over $1.1 billion resulting in a net debt to enterprise value of 50%. Finally, we believe the significant open market purchases of stock (which are junior to our bonds in the capital structure) by the company's Chairman and CEO, Owen Kratz, underscore our investment thesis.

Cogent, Inc., COGT. Cogent is a leading vendor of biometric security solutions, with specific expertise in digital fingerprinting. Cogent's products are used by U.S. agencies and foreign governments, as well as law enforcement organizations in several countries. The firm has won several large, strategic, multiyear contracts that we believe underscore the strength of its products while providing management good visibility into future revenue. Against the backdrop of greater public and private sector investment in security, we thought Cogent's integrated system of products and services, combined with reference wins at major U.S. agencies and foreign governments, made for an interesting investment candidate. Admittedly, shipments under large government contracts can vary greatly from quarter to quarter. Governments buy or deploy products when it fits their operating schedules and not based on ninety-day quarterly reporting periods. Therefore, we spent extra time validating Cogent's large contracts and, in the process, uncovered a pipeline of additional opportunities.

When we analyzed Cogent's balance sheet and financial statements, we found we could acquire a "growth" business at a deep discount. At the time we purchased its common stock, Cogent had a market capitalization just over $780 million. With an unlevered cash balance of $270 million or just over $5.70 per share at June 30, 2010, its enterprise value was just $510 million. Cogent generated $58 million in operating cash flow in fiscal year 2009 (on revenue of $130 million), resulting in a cash flow yield greater than 11%. In short, we decided to invest in the common equity of a business that was delivering strong cash flow, had above-average visibility and a pipeline of potentially large contracts, buttressed by a rock-solid balance sheet.

Against our litmus test of "Would we take this company private in a heartbeat?" we came away with a resounding "Yes." Apparently, 3M felt similarly, and on August 30 announced it would acquire Cogent for $10.50 per share, representing a meaningful premium to the public stock price.

DG FastChannel, Inc., DGIT. DGIT's proprietary network allows for the secure and timely distribution of advertising-agency-generated advertisements to broadcasters, cable companies, and other media outlets. We became familiar with DGIT a year ago while researching media companies, but because it was tagged a "high growth" stock it was not within our price parameters.

DGIT preannounced its third quarter earnings and revenue estimates, disappointing Wall Street analysts. In a matter of weeks, the company's stock dropped roughly 60% as the growth crowd exited en masse, allowing us access to a debt-free, cash-rich balance sheet with strong, albeit at-risk, free cash flow characteristics. The company's stock rebounded soon thereafter, allowing us a quick and successful exit. As part of our research process, we hired an advertising agency to help us better understand emerging competitive threats and ultimately decided that handicapping the company's future earnings was too difficult. It is our belief that DGIT's 20% margins will likely come under significant pressure, and we no longer felt comfortable with the position at its appreciated price.

Disclosure: The specific securities identified and described do not represent all of the securities purchased, sold, or recommended for advisory clients, and the reader should not assume that investments in the securities identified and discussed were or will be profitable. The top three securities purchased in the quarter are based on the largest absolute dollar purchases made in the quarter.

Roumell Asset Management, LLC
Balanced Composite
Annual Disclosure Presentation

YEAR END	TOTAL FIRM ASSETS (MILLIONS)	COMPOSITE ASSETS		ANNUAL PERFORMANCE RESULTS		
		USD (MILLIONS)	NUMBER OF ACCOUNTS	COMPOSITE NET	THOMSON US BALANCED MUTUAL FUND	COMPOSITE DISPERSION
2009	249	55	124	33.19%	23.19%	5.79%
2008	166	40	121	-22.82%	-26.97%	5.01%
2007	270	75	154	-7.58%	5.76%	3.71%
2006	280	87	158	14.00%	10.47%	3.69%
2005	199	73	142	8.56%	4.22%	2.67%
2004	123	66	119	16.48%	7.79%	3.82%
2003	66	42	100	28.26%	18.60%	3.94%
2002	41	27	79	-9.70%	-11.36%	3.77%
2001	31	17	39	21.18%	-4.19%	4.75%
2000	19	10	23	8.47%	1.95%	4.53%
1999	16	9	22	12.53%	8.35%	2.63%

Balanced Composite contains fully discretionary balanced accounts (consisting of equity, fixed income, and cash investments) and for comparison purposes is measured against the Thomson US Balanced Mutual Fund Index. In presentations shown prior to March 31, 2006, the composite was also compared against the Lipper Balanced Index. Additionally, in presentations prior to December 2006, the composite was measured against the Vanguard Balanced Index Fund. The Thomson US Balanced Mutual Fund Index is a blend of more than 500 balanced mutual funds and is therefore deemed to more accurately reflect the strategy of the composite.

Roumell Asset Management, LLC has prepared and presented this report in compliance with the Global Investment Performance Standards (GIPS®).

Roumell Asset Management, LLC is an independent registered investment adviser. The firm maintains a complete list and description of composites, which is available upon request. Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Past performance is not indicative of future results.

The U.S. dollar is the currency used to express performance. Returns are presented net of management fees and include the reinvestment of all income. Net of fee performance was calculated using actual management fees. Beginning in 2010, for certain of these accounts, net returns have been reduced by a performance-based fee of 20% of profits, paid annually in the first quarter. Net returns are reduced by all fees and transaction costs incurred. Wrap fee accounts pay a fee based on a percentage of assets under management. Other than brokerage commissions, this fee includes investment management, portfolio monitoring, consulting services, and in some cases, custodial services. Prior to and post 2006, there were no wrap fee accounts in the composite. For the year ended December 31, 2006, wrap fee accounts made up less than 1% of the composite. Wrap fee schedules are provided by independent wrap sponsors and are available upon request from the respective wrap sponsor. Returns include the effect of foreign currency exchange rates. Exchange rate source utilized by the portfolios within the composite may vary. Composite performance is presented net of foreign withholding taxes. Withholding taxes may vary according to the investor's domicile.

The annual composite dispersion presented is an asset-weighted standard deviation calculated for the accounts in the composite for the entire year. Dispersion calculations are greater as a result of managing accounts on a client relationship basis. Securities are bought based on the combined value of all portfolios of a client relationship and then allocated to one account within a client relationship. Therefore, accounts within a client relationship will hold different securities. The result is greater dispersion amongst accounts. Additional information regarding the policies for calculating and reporting returns is available upon request.

The investment management fee schedule for the composite is as follows: for Direct Portfolio Management Services: 1.75% on the first $200,000, 1.50% on the next $300,000, and 1.00% on assets over $500,000; for Sub-Adviser Services: determined by adviser; for Wrap Fee Services: determined by sponsor. Actual investment advisory fees incurred by clients may vary.

The Balanced Composite was created January 1, 1999. Roumell Asset Management, LLC's compliance with the GIPS® standards has been verified for the period January 1, 1999 through June 30, 2010 by Ashland Partners & Company LLP. In addition, a performance examination was conducted on the Balanced Composite beginning January 1, 1999. A copy of the verification report is available upon request.

Roumell Asset Management, LLC
Fixed Income Composite
Annual Disclosure Presentation

		COMPOSITE ASSETS		ANNUAL PERFORMANCE RESULTS			
YEAR END	TOTAL FIRM ASSETS (MILLIONS)	USD (MILLIONS)	NUMBER OF ACCOUNTS	COMPOSITE NET	BARCLAYS US AGGREGATE BOND	BARCLAYS US CORP HIGH YIELD	COMPOSITE DISPERSION
2009	249	5	11	38.06%	5.94%	58.21%	N/A

N/A—Information is not statistically meaningful due to an insufficient number of portfolios in the composite for the entire year.

Fixed Income Composite contains fully discretionary fixed income accounts (consisting of closed-end bond funds, individual bonds, and open-end bond funds) and for comparison purposes is measured against the Barclays Capital US Aggregate Index and Barclays Capital US Corporate High Yield Index.

Roumell Asset Management, LLC has prepared and presented this report in compliance with the Global Investment Performance Standards (GIPS®).

Roumell Asset Management, LLC is an independent registered investment adviser. The firm maintains a complete list and description of composites, which is available upon request. Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Past performance is not indicative of future results.

The U.S. dollar is the currency used to express performance. Returns are presented net of management fees and include the reinvestment of all income. Net of fee performance was calculated using actual management fees. For certain of these accounts, net returns have been reduced by a performance-based fee of 20% of profits, paid annually in the first quarter. Net returns are reduced by all fees and transaction costs incurred. Returns include the effect of foreign currency exchange rates. Exchange rate source utilized by the portfolios within the composite may vary. Composite performance is presented net of foreign withholding taxes. Withholding taxes may vary according to the investor's domicile.

The annual composite dispersion presented is an asset-weighted standard deviation calculated for the accounts in the composite for the entire year. Dispersion calculations are greater as a result of managing accounts on a client relationship basis. Securities are bought based on the combined value of all portfolios of a client relationship and then allocated to one account within a client relationship. Therefore, accounts within a client relationship will hold different securities. The result is greater dispersion amongst accounts. Additional information regarding the policies for calculating and reporting returns is available upon request.

The investment management fee schedule for the composite is as follows: for Direct Portfolio Management Services: 1.00% on all assets; for Sub-Adviser Services: determined by adviser. Actual investment advisory fees incurred by clients may vary.

The Fixed Income Composite was created and incepted January 1, 2009. Roumell Asset Management, LLC's compliance with the GIPS® standards has been verified for the period January 1, 1999 through June 30, 2010 by Ashland Partners & Company LLP. In addition, a performance examination was conducted on the Fixed Income Composite beginning January 1, 2009. A copy of the verification report is available upon request.

Roumell Asset Management, LLC
Equity Composite
Annual Disclosure Presentation

YEAR END	TOTAL FIRM ASSETS (MILLIONS)	COMPOSITE ASSETS: USD (MILLIONS)	COMPOSITE ASSETS: NUMBER OF ACCOUNTS	ANNUAL PERFORMANCE RESULTS: COMPOSITE NET	S&P 500	RUSSELL 2000	RUSSELL 2000 VALUE	COMPOSITE DISPERSION
2009	249	153	414	42.19%	26.47%	27.18%	20.57%	5.57%
2008	166	104	413	-27.35%	-36.99%	-33.79%	-28.93%	3.40%
2007	270	178	549	-7.67%	5.49%	-1.57%	-9.78%	2.68%
2006	280	176	458	16.89%	15.79%	18.37%	23.48%	2.18%
2005	199	111	312	12.38%	4.91%	4.55%	4.71%	2.59%
2004	123	47	125	20.18%	10.88%	18.33%	22.25%	2.69%
2003	66	15	46	32.13%	28.69%	47.25%	46.03%	4.04%
2002	41	8	44	-10.15%	-22.10%	-20.48%	-11.43%	4.33%
2001	31	5	30	32.76%	-11.89%	2.49%	14.02%	6.33%
2000	19	2	12	7.97%	-9.10%	-3.02%	22.83%	4.05%
1999	16	2	9	26.02%	21.04%	21.26%	-1.49%	3.92%

Equity Composite contains fully discretionary equity accounts and for comparison purposes is measured against the S&P 500, Russell 2000, and Russell 2000 Value Indices. The S&P 500 Index is used for comparative purposes only and is not meant to be indicative of the Equity Composite performance. In presentations shown prior to March 31, 2005, the composite was also compared against the Nasdaq Index. The benchmark was eliminated since it did not represent the strategy of the composite.

Roumell Asset Management, LLC has prepared and presented this report in compliance with the Global Investment Performance Standards (GIPS®).

Roumell Asset Management, LLC is an independent registered investment adviser. The firm maintains a complete list and description of composites, which is available upon request. Results are based on fully discretionary accounts under management, including those accounts no longer with the firm. Past performance is not indicative of future results.

The U.S. dollar is the currency used to express performance. Returns are presented net of management fees and include the reinvestment of all income. Net of fee performance was calculated using actual management fees. Net returns are reduced by all fees and transaction costs incurred. Wrap fee accounts pay a fee based on a percentage of assets under management. Other than brokerage commissions, this fee includes investment management, portfolio monitoring, consulting services, and in some cases, custodial services. Wrap accounts are included in the composite. As of December 31, 2006, 2007, 2008, and 2009, wrap fee accounts made up 33%, 36%, 31%, and 33% of the composite, respectively. Wrap fee schedules are provided by independent wrap sponsors and are available upon request from the respective wrap sponsor. Returns include the effect of foreign currency exchange rates. Exchange rate source utilized by the portfolios within the composite may vary. Composite performance is presented net of foreign withholding taxes. Withholding taxes may vary according to the investor's domicile.

The annual composite dispersion presented is an asset-weighted standard deviation calculated for the accounts in the composite for the entire year. Dispersion calculations are greater as a result of managing accounts on a client relationship basis. Securities are bought based on the combined value of all portfolios of a client relationship and then allocated to one account within a client relationship. Therefore, accounts within a client relationship will hold different securities. The result is greater dispersion amongst accounts. Additional information regarding the policies for calculating and reporting returns is available upon request.

The investment management fee schedule for the composite is as follows: for Direct Portfolio Management Services: 1.75% on the first $200,000, 1.50% on the next $300,000, and 1.00% on assets over $500,000; for Sub-Adviser Services: determined by adviser; for Wrap Fee Services: determined by sponsor. Actual investment advisory fees incurred by clients may vary.

The Equity Composite was created January 1, 1999. Roumell Asset Management, LLC's compliance with the GIPS® standards has been verified for the period January 1, 1999 through June 30, 2010 by Ashland Partners & Company LLP. In addition, a performance examination was conducted on the Equity Composite beginning January 1, 1999. A copy of the verification report is available upon request.