

Newgate Capital Management LLC

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Greenwich, Connecticut 06830

PRODUCT OVERVIEW

Newgate Capital Management LLC's ("Newgate") emerging markets equity portfolio seeks to achieve long-term capital appreciation by investing in companies operating in the emerging markets or whose shares are listed on the stock markets of such countries. Newgate employs a top-down, quantitative country and sector analysis seeking to identify undervalued economic regions, countries and sectors. This is combined with a bottom-up approach to security selection, which focuses on a combination of relative valuation analysis and strategic business evaluation. Newgate seeks companies with dominant market share, a high degree of financial transparency and good corporate governance. Newgate seeks to employ strict liquidity guidelines, with an emphasis on free market float, daily trade volume and local investment restrictions. Newgate invests in American Depositary Receipts, exchange traded funds (ETFs), closed-end country funds and ordinary shares listed directly on American exchanges and will seek to employ the following guideline: a maximum of 20% invested in ETFs and a maximum of 10% invested in closed end country funds. Newgate seeks to outperform the MSCI Emerging Markets Index over a full market cycle while maintaining below benchmark risk. Newgate's investment process may, at times, result in portfolios that will be over/underweighted in particular sectors/countries/regions versus the MSCI Emerging Markets Index.

TARGET PORTFOLIO CHARACTERISTICS

Number of stock holdings:	50 to 65
Average dividend yield:	Above the S&P 500 Index
Cash level over market cycle:	0 to 5%
Risk (standard deviation):	Above the S&P 500 Index
Average turnover rate:	65 to 100%
Capitalization:	Large, Medium and Small companies

MANAGER'S INVESTMENT PROCESS

- Top-down, quantitative country and sector analysis to identify undervalued economic regions, countries and sectors
- Comprehensive macroeconomic and geopolitical analysis to establish country and sector allocation
- Bottom-up approach combining relative valuation analysis and strategic business evaluation for security selection
- Seeks companies with dominant market share, high degree of financial transparency and good corporate governance
- Newgate will sell stocks when there are changes in regional, country or sector allocations, followed by tactical decisions to modify individual investments within a particular market or sector

RISK CONSIDERATIONS

Investing in securities entails risks, including: International investing should be considered one component of a complete and diversified investment program. Investing in foreign markets entails greater risks than those normally associated with domestic markets such as foreign political, currency, economic and market risks. In addition, the securities markets of many emerging markets are substantially smaller, less developed, less liquid and more volatile than the securities of the U.S. and other more developed countries.

MANAGER'S INVESTMENT STRATEGY

- ☑ Top-down / portfolio structures based on economic trends
- ☑ Bottom-up / portfolio structure based on individual securities

% PROCESS BASED ON

40 Country Weightings
20 Currency Decision
0 Currency Hedge
20 Industry/Sector Selection
0 Asset Allocation
20 Issue Selection

Style: Emerging Markets Equity
Firm Assets Under Management: \$3.1 billion[^]
Firm Strategy Assets Under Management: \$2.4 billion[^]
Year Founded: 1982
Professional Staff: 20[^]
Firm Ownership: Employee-Owned
Research Status: Approved

PORTFOLIO STATISTICS^{*}

	Newgate	03/11 MSCI Emerging Markets NET Index	S&P 500 Index	09/10 Newgate
Number of stock holdings	44	809	500	55
Weighted average dividend yield	2.3%	2.2%	1.8%	1.4%
Weighted average portfolio beta	1.19	0.56	1.02	1.28
Mega capitalization ^{1 +}	18.2%	0.0%	34.5%	14.1%
Large capitalization ^{1 +}	58.5%	45.0%	51.0%	35.2%
Medium capitalization ^{1 +}	20.9%	40.1%	14.3%	28.2%
Small capitalization ^{1 +}	2.4%	14.7%	0.2%	10.8%
Micro capitalization ^{1 +}	0.0%	0.1%	0.0%	11.6%

PORTFOLIO'S EQUITY SECTOR WEIGHTINGS⁺

	Newgate ²	03/11 MSCI Emerging Markets NET Index ²
Energy	—	—
Materials	—	—
Industrials	—	—
Consumer Discretionary	—	—
Consumer Staples	—	—
Health Care	—	—
Financials	—	—
Information Technology	—	—
Telecomm Services	—	—
Utilities	—	—
Cash/Cash Equivalents	—	—

PORTFOLIO'S ALLOCATION HISTORY (%)⁺

	03/11	12/10	09/10	06/10
U.S. Stocks	2	7	25	21
ADRs/Non-U.S. Stocks	96	91	73	76
Cash/Cash Equivalents	1	2	3	3

PORTFOLIOS COUNTRY WEIGHTINGS %⁺

	Newgate ¹	03/11 MSCI Emerging Markets NET Index ¹	09/10 Newgate ²
Brazil	23.23	15.93	—
China	20.45	12.26	—
South Korea	12.54	14.35	—
Russia	11.82	7.28	—
India	6.31	7.45	—
Hong Kong	5.10	5.19	—
South Africa	5.07	7.43	—
United States	2.22	0.21	—
Taiwan	1.96	10.88	—
Canada	1.68	0.00	—

PORTFOLIO'S TOP FIVE EQUITY HOLDINGS⁺

	%
Vale S.A. ADS	5.7
POSCO (ADR)	5.3
Itau Unibanco Holding S/A ADS	5.2
Lukoil Holdings ADS	4.9
China Construction Bank Corp. ADS	4.1

[^]As of 09/30/2010. Information as of 03/31/2011 is not yet available.

¹% of Total Equity Market Value

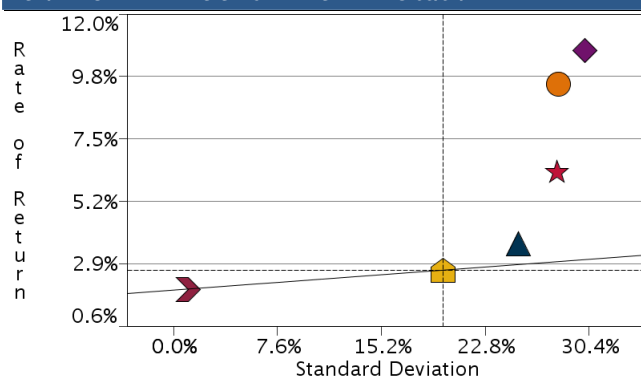
²Information as of 03/31/2011 is not yet available.

³Total may not equal 100% due to rounding.

⁴Based on a representative actual Morgan Stanley Smith Barney SM portfolio as calculated by FactSet.

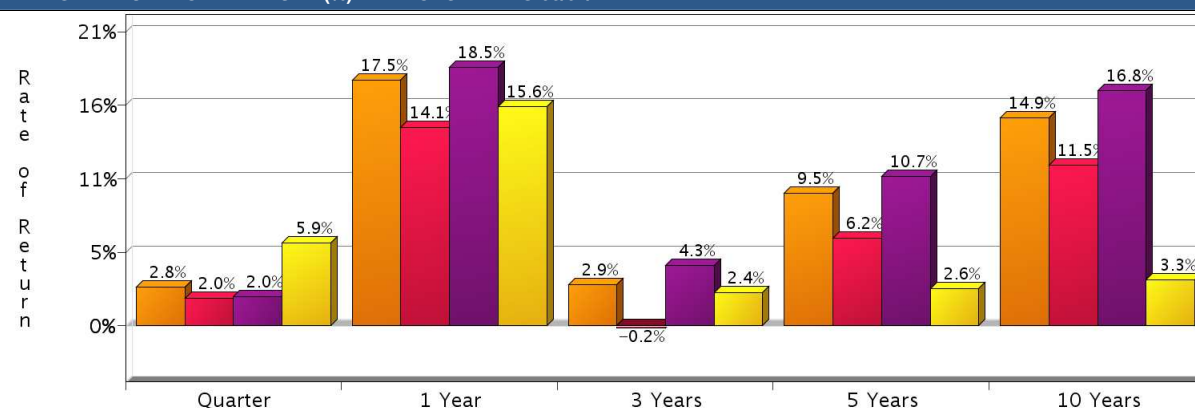
Past performance is no guarantee of future results. This profile is not complete without pages 3 and 4, which contain important notes, including disclosures about the composite, index descriptions and a glossary of terms. Information shown is as of March 31, 2011, unless otherwise noted. All data are subject to change.

RISK/RETURN ANALYSIS – 5 YEARS ENDING 03/31/11



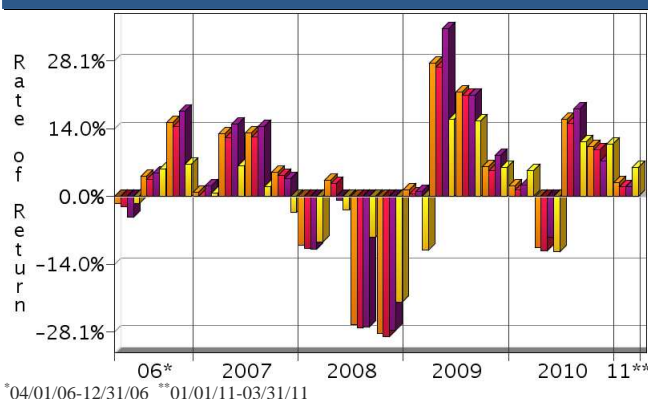
	STD	ROR
Newgate (Gross)	28.18	9.48
Newgate (Net)	28.09	6.23
MSCI Emerging Markets NET Index	30.15	10.70
MSCI AC World Ex-US NET Index	25.24	3.59
S&P 500 Index	19.73	2.62
90-Day U.S. T-Bill Index	1.05	1.93

AVERAGE ANNUAL TOTAL RETURN (%) – PERIODS ENDING 03/31/11







INVESTMENT RESULTS	Annual Rates of Return (%)										10 Year - Ending 03/31/11	
	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	Annualized	Std. Dev.
Newgate (Gross)	-1.45	-4.31	58.59	15.58	28.08	28.80	35.27	-51.04	66.96	16.81	14.86	26.16
Newgate (Net)	-4.42	-7.21	54.10	12.11	24.23	25.19	31.40	-52.66	62.17	13.40	11.46	26.09
MSCI Emerging Markets NET Index	-2.62	-6.17	55.82	25.55	34.00	32.17	39.39	-53.33	78.51	18.88	16.79	27.85
S&P 500 Index	-11.89	-22.10	28.68	10.88	4.91	15.79	5.49	-37.00	26.46	15.06	3.29	18.30

RISK VOLATILITY



*04/01/06-12/31/06 **01/01/11-03/31/11

	Number Of	Up Qtrs.	Down Qtrs.
 Newgate (Gross)		15	5
 Newgate (Net)		15	5
 MSCI Emerging Markets NET Index		14	6
 S&P 500 Index		12	8

PORTFOLIO'S QUARTERLY RETURNS (%)

	Quarter 1		Quarter 2		Quarter 3		Quarter 4	
	Gross	Net	Gross	Net	Gross	Net	Gross	Net
2001	-5.27	-6.02	6.69	5.94	-19.22	-19.97	20.71	19.96
2002	12.76	12.01	-7.12	-7.87	-17.43	-18.18	10.65	9.90
2003	-5.73	-6.45	22.11	21.28	14.09	13.27	20.75	19.92
2004	2.99	2.23	-11.40	-12.13	8.31	7.49	16.94	16.10
2005	0.42	-0.34	5.09	4.27	13.68	12.87	6.76	5.91
2006	8.71	7.97	-1.39	-2.08	4.24	3.46	15.27	14.44
2007	0.86	0.09	12.91	12.09	13.09	12.26	5.03	4.33
2008	-10.05	-10.79	3.36	2.66	-26.58	-27.15	-28.28	-29.04
2009	1.41	0.59	27.57	26.73	21.66	20.85	6.08	5.26
2010	2.13	1.31	-10.61	-11.27	15.90	15.10	10.39	9.60
2011	2.77	1.98						

☒ Related
 ☐ Fiduciary Services
PORTFOLIO'S RISK STATISTICS – PERIODS ENDING 03/31/11^{1,2}

	3 Year	5 Year
Standard Deviation	34.20%	28.18%
Standard Deviation of Primary Benchmark	36.10%	30.15%
Sharpe Ratio	0.07	0.27
Sharpe Ratio of Primary Benchmark	0.11	0.29
Alpha	-1.14%	-0.57%
Beta	0.94	0.92
Downside Risk	4.95%	4.13%
R-Squared	0.98	0.98
Tracking Error	5.83%	4.99%
Information Ratio	-0.24	-0.24

PORTFOLIO DIVERSIFICATION - R² (10 YEARS ENDING 03/11)⁺

	R ²
Newgate vs. S&P 500 Index	0.76
Newgate vs. MSCI Emerging Markets NET Index	0.97

*Statistics are calculated using gross of fee performance only.

1. Statistics are calculated using gross of fee performance only.

2. MSCI Emerging Markets NET Index was used as the primary benchmark and the 90-Day U.S. T-Bill Index as the risk-free benchmark.

See page 3 for a discussion of the sources of the performance data used to calculate the performance results and related analyses on page 2.

Past performance is no guarantee of future results. This profile is not complete without pages 3 and 4, which contain important notes, including disclosures about the composite, index descriptions and a glossary of terms. Information shown is as of March 31, 2011, unless otherwise noted. All data are subject to change.

IMPORTANT NOTES AND DISCLOSURES

COMPOSITE DISCLOSURES

Past performance is no guarantee of future results. Actual individual account results may differ from the performance shown in this profile. There is no guarantee that this investment strategy will work under all market conditions. Do not use this profile as the sole basis for your investment decisions.

Performance results in this profile are calculated assuming reinvestment of dividends and income. Returns for more than one year are annualized and based on quarterly data. Returns for periods of less than a calendar year show the total return for the period and are not annualized. All results are dollar denominated.

Related Performance (Manager's Composite):

For periods before the date on which Morgan Stanley Smith Barney begins to calculate an applicable performance composite for actual Morgan Stanley Smith Barney Fiduciary Services program accounts, the performance composite and certain other information for this strategy (including the data on page 1 of this profile) are based on the investment manager's own composite and data. This composite includes accounts managed by the investment manager according to the same or a substantially similar investment strategy. To provide maximum information to you, the investment manager's own composite is linked to the Morgan Stanley Smith Barney Fiduciary Services composite to create a simulated continuous track record of performance information for the investment strategy. The investment manager's composite may include separately managed accounts, institutional accounts and/or mutual funds. Performance and other data for the investment managers composite may vary from that of Morgan Stanley Smith Barney accounts due to differences such as the availability and weighting of securities, trading implementation or client objectives. Morgan Stanley Smith Barney does not verify composite and other data provided by the investment manager and therefore does not guarantee its accuracy. Some of the accounts in the investment managers composite may have invested in the initial public offering ("IPO") market, whereas accounts held in Morgan Stanley Smith Barney programs do not do so. Since investment managers may use different methods of selecting accounts to be included in their composites and for calculating performance, returns of different investment managers may not be comparable.

Related Performance:

Newgate Capital Management LLC's <prduct>'s performance prior to 4/1/2004 represents a composite of all actual, fee-paying, fully discretionary emerging markets equity accounts under management. The composite was size-weighted and consisted of 137 accounts with a market value of \$800.0 million as of 3/31/2004.

Fiduciary Services Performance:

In this profile, the performance from 4/1/2004 consists of accounts in either the Morgan Stanley or the Smith Barney form of the Fiduciary Services program. Performance composites calculated by Morgan Stanley Smith Barney include all fee-paying portfolios with no investment restrictions. New accounts are included upon the first full quarter of performance. Terminated accounts are removed in the quarter in which they terminate. Performance is calculated on a total return basis and by asset weighting the individual portfolio returns using the beginning of period values.

Emerging Markets Equity Account (Gross): Newgate' gross results do not reflect a deduction of the investment advisory fees charged by Newgate, or program fees, if any, but are net of commissions charged on securities transactions.

Morgan Stanley Smith Barney Fiduciary Services program fees are deducted quarterly. The quarterly deduction has a compounding effect on performance. For example, an investment manager with a gross annual return of 7.00% whose quarterly gross returns were 3.05%, 3.15%, -0.45% and 1.12% would have an annual net return of 3.91% where net quarterly returns were 2.3075%, 2.4075%, -1.1925% and 0.3775%. This assumes a maximum 2.97% annual (0.7425% quarterly) Fiduciary Services program fee.

For periods for which sufficient data is available, the profile shows a composite of client accounts managed by the investment manager in either the Fiduciary Services program in the Morgan Stanley channel (previously called the Morgan Stanley Access program) or the Fiduciary Services program in the Smith Barney channel. Fiduciary Services is a separately managed account program sponsored by Morgan Stanley Smith Barney. If the strategy or similar strategies are available in both the Morgan Stanley and Smith Barney forms of the program, this profile presents the composite for the strategy that is closest to the strategy currently offered in the Fiduciary Services program. If both

strategies are equally close, this profile shows the longer of the two composites. Performance and other data for composites for both forms of the program may vary from each other and from composites in other Morgan Stanley Smith Barney programs due to differences such as the availability and weighting of securities, trading implementation or client objectives.

Focus List, Approved List, and Watch Status:

Consulting Group Investment Advisor Research ("CG IAR") uses two methods to evaluate investment products in applicable advisory programs. In general, strategies that have passed a more thorough evaluation may be placed on the "Focus List, while strategies that have passed through a different and less comprehensive evaluation process may be placed on the Approved List". Sometimes an investment product may be evaluated using the Focus List process but then placed on the Approved List instead of the Focus List.

Investment products may move from the Focus List to the Approved List, or vice versa. CG IAR may also determine that an investment product no longer meets the criteria under either research process and will no longer be recommended in investment advisory programs (in which case the investment product is given a "Not Approved" status).

CG IAR has a "Watch" policy and may describe a Focus List or Approved List investment product as being on "Watch" if CG IAR identifies specific areas that (a) merit further evaluation by CG IAR and (b) may, but are not certain to, result in the investment product becoming "Not Approved". The Watch period depends on the length of time needed for CG IAR to conduct its evaluation and for the investment manager to address any concerns. CG IAR may, but is not obligated to, note the Watch status in this report with a "W" or "Watch" on the cover page.

For more information on the Focus List, Approved List, and Watch processes, please see the applicable Morgan Stanley Smith Barney ADV brochure. Your Financial Advisor, Private Wealth Advisor or Private Banker can provide on request a copy of a paper entitled "Manager Research and Selection: A Disciplined Process".

ADDITIONAL DISCLOSURES

The information about a representative account is for illustrative purposes only. Actual account holdings, performance and other data will vary depending on the size of an account, cash flows within an account, and restrictions on an account. Holdings are subject to change daily. The information in this profile is not a recommendation to buy, hold or sell securities.

Actual portfolio statistics may vary from target portfolio characteristics.

The investment manager may use the same or substantially similar investment strategies, and may hold similar portfolios of investments, in other portfolios or products it manages (including mutual funds). These may be available at Morgan Stanley Smith Barney or elsewhere, and may cost an investor more or less than this strategy in the Morgan Stanley Smith Barney Fiduciary Services program.

The portfolio may, at times, invest in exchange-traded funds (ETFs), which are a form of equity security in seeking to maintain continued full exposure to the broad equity market.

Morgan Stanley Smith Barney investment advisory programs may require a minimum asset level and, depending on your specific investment objectives and financial position, may not be suitable for you. Investment advisory program accounts are opened pursuant to a written client agreement.

The investment manager acts independently of, and is not an affiliate of, Morgan Stanley Smith Barney.

Morgan Stanley Smith Barney LLC Member SIPC.

INDEX DESCRIPTIONS

90-Day U.S. T-Bill Index

The 90-Day Treasury Bill is a short-term obligation issued by the United States government. T-bills are purchased at a discount to the full face value, and the investor receives the full value when they mature. The difference of 'discount' is the interest earned. T-bills are issued in denominations of \$10,000 (auction) and \$1,000 increments thereafter.

MSCI AC World Ex-US NET Index

The Morgan Stanley Capital International (MSCI) All Country World Ex-US Net Index is a broad market capitalization-weighted index covering all emerging and developed world equity markets, with the exception of the United States. Performance is shown net of withholding tax.

MSCI Emerging Markets NET Index

The Morgan Stanley Capital International (MSCI) Emerging Markets NET Index is a free float-adjusted market capitalization index. It is composed of companies representative of the market structure of emerging market countries in Europe, Latin America and the Pacific Basin. Performance is shown net of withholding tax.

S&P 500 Index

Widely regarded as the best single gauge of the U.S. equities market, this world-renowned index includes a representative sample of 500 leading companies in leading industries of the U.S. economy. Although the S&P 500 focuses on the large-cap segment of the market, with over 80% coverage of U.S. equities, it is also an ideal proxy for the total market.

Indices are unmanaged and have no expenses. You cannot invest directly in an index.

GLOSSARY OF TERMS

Alpha is a mathematical estimate of risk-adjusted return expected from a portfolio above and beyond the benchmark return at any point in time.

American Depositary Receipts (ADRs) are receipts for shares of a foreign-based corporation held in the vault of a U.S. bank.

Average Portfolio Beta is a measure of the sensitivity of a benchmark or portfolio's rates of return to changes against a market return. The market return is the S&P 500 Index. It is the coefficient measuring a stock or a portfolio's relative volatility.

Capitalization is defined as the following: Mega (\$50.0 billion and Above), Large (\$11.0 - \$50.0 billion), Medium (\$2 - \$11.0 billion), Small (\$500m - \$2 billion) and Micro (below \$500 million).

Downside Risk is a measure of the risk associated with achieving a specific target return. This statistic separates portfolio volatility into downside risk and upside uncertainty. The downside considers all returns below the target return, while the upside considers all returns equal to or above the target return.

Duration is a measure of price sensitivity expressed in years.

Information Ratio is a measure of the investment manager's skill to add active value against a given benchmark relative to how stable that active return has been. Essentially, the information ratio explains how significant a manager's alpha is. Therefore, the higher the information ratio, the more significant the alpha.

Investment Grade Bonds are those rated by Standard & Poor's AAA (highest rated), AA, A or BBB (or equivalent rating by other rating agencies or, in the case of securities not rated, by the investment manager).

Price/Earnings Ratio (P/E Ratio) shows the multiple of earnings at which a stock sells. Determined by dividing current stock price by current earnings per share (adjusted for stock splits). Earnings per share for the P/E ratio are determined by dividing earnings for past 12 months by the number of common shares outstanding.

R² (R-Squared)/Portfolio Diversification indicates the proportion of a security's total variance that is benchmark-related or is explained by variations in the benchmark.

Sharpe Ratio measures the efficiency, or excess return per unit of volatility, of a manager's returns. It evaluates managers' performance on a volatility-adjusted basis.

Standard Deviation is a statistical measure of historical variability or spread of returns around a mathematical average return that was produced by the investment manager over a given measurement period. The higher the standard deviation, the greater the variability in the investment manager's returns relative to its average return.

Tracking Error represents the standard deviation of the difference between the performance of the investment strategy and the benchmark. This provides a historical measure of the variability of the investment strategy's returns relative to its benchmark.