<u>New Constructs®</u>

S&P 500 Index ETFs

Ratings of Investment Merit

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- We recommend investors buy only the Very Attractive and Attractive stocks in the S&P 500, not an S&P 500 ETF.
- S&P 500 ETFs have Neutral Overall Risk/Reward Ratings because the index offers upside potential that is fairly balanced with downside risk.
- This research enables investors to analyze funds as they analyze stocks.
- We offer custom and enhanced ETFs based on our topranked stock rating system.
- Our analysis is based on aggregation of models for companies in the S&P 500 and weighted according to the ETFs' allocations to those companies.
- We offer individual ETF reports on 400+ ETFs.

| Overall Risk/Reward | Quality of Earnings | | Valuation | | |
|---------------------|-----------------------------|-----------------|-----------|----------------|--------------|
| Rating | Econ v Reported Earnings | ROIC | FCF Yield | Price-to-EBV | GAP (yrs) |
| Very Dangerous | Misleading Trend | Bottom Quintile | <-5% | >3.5 or -1<0 | More than 50 |
| Dangerous | False Positive | 4th Quintile | -5%<-1% | 2.4<3.5 or <-1 | 20<50 |
| Neutral | Neutral EE | 3rd Quintile | -1%<3% | 1.6<2.4 | 10<20 |
| Attractive | Positive EE | 2nd Quintile | 3%<10% | 1.1<1.6 | 3<10 |
| Very Attractive | Rising EE | Top Quintile | >10% | 0<1.1 | Less than 3 |
| | | | | | |
| Market-Weighted Avg | n/a | 18.4% | 2.1% | 2.0 | 22 |

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Important Disclosure Information is contained on the last page of this report. The recipient of this report is directed to read these disclosures.

S&P 500 ETF Overview

There are currently 6 S&P 500 ETFs with an average expense ratio of 0.1% and over \$126 billion in assets. These ETFs have nearly identical holdings and weightings. The Risk/Reward ratings and weighted-average values in this report apply to each of these ETFs.

| ETF Symbol | ETF Name | Expense Ratio | Exposure | Index | Market cap |
|---------------|----------------------------|------------------|----------------|---------|------------------|
| SPY | SPDR S&P 500 | 0.1% | Long | S&P 500 | \$95,196,950,042 |
| IVV | iShares S&P 500 Index Fund | 0.1% | Long | S&P 500 | \$27,585,112,000 |
| SSO | ProShares Ultra S&P500 | 1.0% | Double Long | S&P 500 | \$1,571,400,000 |
| VOO | Vanguard S&P 500 ETF | 0.1% | Long | S&P 500 | \$1,338,542,687 |
| UPRO | ProShares UltraPro S&P 500 | 1.0% | Triple Long | S&P 500 | \$262,548,000 |
| RSU | Rydex 2x S&P 500 ETF | 0.7% | Double Long | S&P 500 | \$89,800,090 |

Figure 2: Top 6 U.S. Equity S&P 500 ETFs by Market Cap

Sources: New Constructs, LLC

For a detailed description of an individual ETF's predictive ratings, purchase an <u>Individual ETF Report</u> for any of the 400+ ETF's we cover. Sample reports are available <u>here</u>.

Our Risk/Reward ratings have a solid track record of outperformance for investors.

Barron's ranked us #1 for stock-picking.

Methodology

This report offers recommendations on S&P 500 ETFs and benchmarks for (1) investors considering buying S&P 500 ETFs and for (2) comparing individual ETFs to the Russell 2000 index. Our analysis is based on aggregating results from our models on each of the companies included in the S&P 500 (481 companies) based on data as of July 12, 2011¹. We aggregate results for the ETFs in the same way the ETFs are designed. Our goal is to empower investors to analyze ETFs in the same way they analyze individual stocks.

To make an informed ETF investment decision, investors must consider the ETF's investment merit. An ETF's investment merit is determined by the quality of the ETF's holdings. We apply our stock rating system to each ETF's holdings to determine its investment merit.

Given the <u>success</u> of our rating system for individual stocks, we believe its application to groups of stocks (i.e. ETFs and funds) helps investors make more informed ETF and mutual fund buying decisions. Barron's featured our uniquely predictive ETF research in "<u>The Danger Within</u>".

Recommendations Summary

If you require exposure to the S&P 500:

We recommend investors buy only the Very Attractive and Attractive-rated stocks in the S&P 500 as opposed to an S&P 500 ETF. Per Figure 5 below, S&P 500 ETFs allocate 57% of their values to holdings in Neutralor-worse-rated stocks. Please contact us if you would like access to an ETF of only the Very Attractive and Attractive-rated stocks for the S&P 500 or any other ETF².

If you require exposure to a sector ETF:

We recommend investors review our <u>Sector ETF Roadmap</u> report or our <u>10 sector ETF reports</u>, beginning with our Information Technology and Consumer Staples sector reports, which are the only sectors to earn an Attractive Overall Risk/Reward rating.

If you require exposure to a market ETF:

Investors seeking diversification with a single position or investors looking to buy a market ETF should consider an S&P 500 ETF over a Russell 2000 ETF. See the next section below, which compares S&P 500 ETFs to Russell 2000 ETFs.

If you are looking for exposure to the best stocks in the market: We recommend you buy our <u>Most Attractive Stocks</u>.

² We offer custom aggregation reports with our ratings for any ETF, mutual fund, or portfolio. We help improve your portfolio's ratings by overweight stocks with Attractive ratings and underweighting stocks with Dangerous ratings. <u>Contact us</u> for more information.

Custom ETFs: <u>Contact us</u> for best-of-breed and enhanced ETF products for a particular sector or index.

¹ For an explanation of the merits of using market-weighted averages in aggregation analysis instead of aggregate values, see Jeremy Siegel's WSJ article <u>"The S&P Gets Its Earnings Wrong."</u>

Click here for more info on

risk/reward rating system and our approach to equity

research.

Market ETF Benchmark

Ratings comparison

S&P 500 ETFs outperform Russell 2000 ETFs in valuation ratings. S&P 500 ETFs have Price-to-EBVs of 2.0, earning them Neutral ratings, and GAPs of 22 years compared to Russell 2000 ETFs' Very Dangerous Price-to-EBVs of 4.2 and GAPs of 53 years.

S&P 500 ETFs also outperform Russell 2000 ETFs in quality of earnings ratings. S&P 500 ETFs' ROICs of 18.4% place them in the top quintile while Russell 2000 ETFs' ROIC of 8.7% place them in the 3rd quintile.

Figure 3: S&P 500 ETFs – Risk/Reward Rating

| Owned Disk/Downed | Quality of Earnings | | Valuation | | |
|-------------------------------|-----------------------------|-----------------|-----------|----------------|--------------|
| Overall Risk/Reward Rating | Econ v Reported Earnings | ROIC | FCF Yield | Price-to-EBV | GAP (yrs) |
| Very Dangerous | Misleading Trend | Bottom Quintile | <-5% | >3.5 or -1<0 | More than 50 |
| Dangerous | False Positive | 4th Quintile | -5%<-1% | 2.4<3.5 or <-1 | 20<50 |
| Neutral | Neutral EE | 3rd Quintile | -1%<3% | 1.6<2.4 | 10<20 |
| Attractive | Positive EE | 2nd Quintile | 3%<10% | 1.1<1.6 | 3<10 |
| Very Attractive | Rising EE | Top Quintile | >10% | 0<1.1 | Less than 3 |
| | | | | | • |
| Market-Weighted Avg | n/a | 18.4% | 2.1% | 2.0 | 22 |

Sources: New Constructs, LLC and company filings

Figure 4: Russell 2000 ETFs – Risk/Reward Rating

| Overall Risk/Reward | Quality of Earnings | | Valuation | | |
|---------------------|----------------------------------|-----------------|-----------|----------------|--------------|
| Rating | Econ v Reported Earnings (bn) | ROIC | FCF Yield | Price-to-EBV | GAP (yrs) |
| Very Dangerous | Misleading Trend | Bottom Quintile | <-5% | >3.5 or -1<0 | More than 50 |
| Dangerous | False Positive | 4th Quintile | -5%<-1% | 2.4<3.5 or <-1 | 20<50 |
| Neutral | Neutral EE | 3rd Quintile | -1%<3% | 1.6<2.4 | 10<20 |
| Attractive | Positive EE | 2nd Quintile | 3%<10% | 1.1<1.6 | 3<10 |
| Very Attractive | Rising EE | Top Quintile | >10% | 0<1.1 | Less than 3 |
| | | | | | |
| Market-Weighted Avg | n/a | 8.7% | -1.2% | 4.2 | 53 |

Sources: New Constructs, LLC and company filings

Allocation Comparison

S&P 500 ETFs allocate capital more effectively than the Russell 2000 ETFs. Per Figures 5 and 6 below, S&P 500 ETFs allocate 43% of their values to Attractive-or-better-rated stocks while Russell 2000 ETFs allocate only 17%. S&P 500 ETFs also allocate 24% of their values toward Dangerous-or-worse-rated stocks compared to Russell 2000 ETFs' Dangerous-or-worse weightings of 57%.





Figure 6: Russell 2000 ETFs – Allocation & Holdings by Risk/Reward Rating

Sources: New Constructs, LLC and company filings

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S&P 500 ETFs Overview

Figure 7 lists the top 25 companies in the S&P 500 by market capitalization representing about 35% of the overall index.

| Ticker | Company Name | Industry | P/E Ratio | % of Index |
|--------|---|----------------------------|-----------|------------|
| XOM | Exxon Mobil Corp | Energy | 13.3 | 3% |
| AAPL | Apple Inc. | Information Technology | 23.6 | 3% |
| MSFT | Microsoft Corporation | Information Technology | 12.7 | 2% |
| IBM | International Business Machines Corp | Information Technology | 15.1 | 2% |
| CVX | Chevron Corporation | Energy | 11.1 | 2% |
| GE | General Electric Company | Industrials | 17.4 | 2% |
| WMT | Wal-Mart Stores, Inc. | Consumer Staples | 12.1 | 2% |
| JNJ | Johnson & Johnson | Health Care | 14.1 | 2% |
| PG | The Procter & Gamble Company | Consumer Staples | 16.0 | 2% |
| т | AT&T Inc. | Telecommunication Services | 9.2 | 2% |
| GOOG | Google Inc. | Information Technology | 20.5 | 1% |
| ORCL | Oracle Corporation | Information Technology | 19.6 | 1% |
| PFE | Pfizer Inc. | Health Care | 19.5 | 1% |
| JPM | JPMorgan Chase & Company | Financials | 10.0 | 1% |
| KO | The Coca-Cola Company | Consumer Staples | 13.4 | 1% |
| WFC | Wells Fargo & Company | Financials | 12.5 | 1% |
| INTC | Intel Corporation | Information Technology | 11.2 | 1% |
| PM | Philip Morris International, Inc. | Consumer Staples | 17.0 | 1% |
| SLB | Schlumberger Ltd. | Energy | 25.8 | 1% |
| С | Citigroup Inc. | Financials | 11.2 | 1% |
| MRK | Merck & Co., Inc. | Health Care | 130.6 | 1% |
| PEP | PepsiCo Inc. | Consumer Staples | 17.6 | 1% |
| COP | ConocoPhillips | Energy | 9.8 | 1% |
| VZ | Verizon Communications, Inc. | Telecommunication Services | 41.1 | 1% |
| BAC | Bank of America Corp | Financials | -27.7 | 1% |
| Total | | | | 35% |

Figure 7: Top 25 S&P 500 Companies by Market Cap.

Sources: New Constructs, LLC

Appendix: Risk/Reward Rating System

Our Risk/Reward Rating System assigns a rating to every stock we cover according to what we believe are the 5 most important criteria for assessing the risk versus reward of stocks. See table that follows for details.

| Overall Risk/Reward Ranking | The Overall Risk/Reward Ranking provides a final rating based on the equal-weighted average rating of each criterion. |
|-----------------------------------|---|
| Very Dangerous | FCF Yield is not included in the average. |
| Dangerous | FCF Yield is not included in the average. |
| Neutral | All criteria are equal-weighted in the average calculation. |
| Attractive | All criteria are equal-weighted in the average calculation. |
| Very Attractive | All criteria are equal-weighted in the average calculation. |

| Economic vs Reported Earnings | Rates stocks based on how their Economic Earnings compare to their Reported Earnings. Values based on Latest Fiscal Year. |
|-------------------------------------|---|
| Very Dangerous | Negative and declining Economic Earnings despite positive and rising Reported Earnings |
| Dangerous | Same as above except Reported Earnings are not rising or Reported Earnings are not positive |
| Neutral | Negative Economic and Reported Earnings |
| Attractive | Economic Earnings are positive |
| Very Attractive | Economic Earnings are positive and rising |

| Return on Invested Capital (ROIC) | Rates stocks based on their ROIC. Values based on Latest Fiscal Year. |
|---|---|
| Bottom Quintile | Very Dangerous = the bottom 20% of Russell 1000 companies |
| 4th Quintile | Dangerous = the bottom 40% of Russell 1000 companies |
| 3rd Quintile | Neutral = the middle 20% of Russell 1000 companies |
| 2nd Quintile | Attractive = the top 40% of Russell 1000 companies |
| Top Quintile | Very Attractive = the top 20% of Russell 1000 companies |

| FCF Yield | Rates stocks based on their Free Cash Flow Yield. Values based on Latest Closing Stock price and Latest Fiscal Year. | |
|-----------|--|--|
| <-5% | Very Dangerous = less than or equal to -5% | |
| -5%<-1% | Dangerous = more than -5% but less than or equal to -1% | |
| -1%<3% | Neutral = more than -1% but less than or equal to +3% | |
| 3%<10% | Attractive = more than +3% but less than or equal to +10% | |
| >10% | Very Attractive = more than +10% | |

| Price-to-EBV Ratio | Rates stocks based on their Price-to-Economic Book Value Ratio. Values based on Latest Closing Stock price and Latest Fiscal Year. |
|--|--|
| >3.5 or -1>0 | Very Dangerous = greater than or equal to 3.5 or less than 0 but greater than -1 |
| 2.4>3.5 or <-1 | Dangerous = greater than or equal to 2.4 but less than 3.5 and less than or equal to -1 |
| 1.6>2.4 | Neutral = greater than or equal to 1.6 but less than 2.4 |
| 1.1>1.6 | Attractive = greater than or equal to 1.1 but less than 1.6 |
| 0>1.1 | Very Attractive = greater than or equal to 0 but less than 1.1 |
| | |
| Growth Appreciation Period (yrs) | Rates stocks based on their Market-Implied Growth Appreciation Period. Values based on Latest Closing Stock price and Default Forecast Scenario. |
| >50 | Very Dangerous = greater than or equal to 50 years |
| 20>50 | Dangerous = at least 20 years but less than 50 |
| 10>20 | Neutral = at least 10 years but less than 20 |
| 3>10 | Attractive = at least 3 years but less than 10 |
| 0>3 | Very Attractive = at least 0 years but less than 3 |

New Constructs[®] – Profile

How New Constructs Creates Value for Clients

- 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 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.
- 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.
- Transparency We are proud to share the results of our analysis of over 50,000 10Ks. See the <u>Corporate Disclosure Transgressions</u> report we provided the SEC. Our reports detail all data and assumptions. Company Models enable users to change them.
- Objectivity New Constructs is an independent research firm, not tied to Wall Street or investment banking services. Our models are driven by comprehensive high-quality data not stories. 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. Accounting data must be translated into economic earnings 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. Economic earnings 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 underlying cash flows of the business.

Additional Information

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. We translate accounting data from 10Ks into economic financial statements, i.e. <u>NOPAT</u>, <u>Invested Capital</u>, and <u>WACC</u>, to create <u>economic earnings models</u>, which are necessary to understand the true profitability and valuation of companies. Visit the <u>Free Archive</u> to download samples of our research. New Constructs is a <u>BBB accredited</u> business and a member of the <u>Investorside Research Association</u>.

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