New Constructs®

PREDICTIVE FUND RATING

02/01/12

NAV as of 01/31/12: \$23.98

FLRUX - Dangerous Rating

Flex-funds Trust: Utilities & Infrastructure Fund



*	****	

Predictive Rating

Total Annual Costs

Portfolio Management

Dangerous Dangerous Dangerous <u>Predictive Ratings</u> are based on aggregating our stock ratings on each
of the fund's holdings and all of the fund's expenses.

Stock-picking (<u>Portfolio Management</u>) and fund expenses (<u>Total Annual Costs</u>) drive fund performance.

Investment Recommendation

- · We recommend investors avoid FLRUX.
- We expect the fund to continue underperforming the market.
- FLRUX's Portfolio Management rating does not justify its high Total Annual Costs.

Portfolio Management Rating Details

- FLRUX receives our Dangerous rating because it overweights Dangerous-or-worse-rated stocks.
- XLU, FLRUX's benchmark, receives our Dangerous 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.

Fund Rankings

- 9th percentile of the 7000+ equity funds we cover.
- 33 out of 39 Utilities funds.
- · All 9 ETFs in the same category rank better.
- See rankings for all US equity funds on our free fund screener.

Portfolio Management Rating Breakdown

Business Strength

*****	Quality of Earnings	Dangerous
*****	Return on Invested Capital (ROIC)	7.10%

Valuation

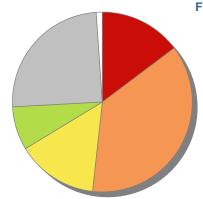
★★★ ☆	Free Cash Flow Yield	6.82%
****	Price to Economic Book Value	3.05
****	Market-Implied Duration of Growth	26 year(s)

Fund Asset Allocation

XLU Allocations

★★★★☆ Cash Allocation 1.09% cash

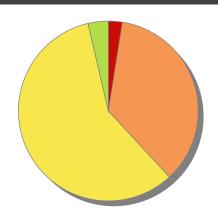
Stock and Cash Rating Allocations vs Benchmark - Utilities Select Sector SPDR (XLU)



FLRUX Allocations

14.74%	Very Dangerous ★☆☆☆☆	2.51%
37.01%	Dangerous ★★☆☆	35.62%
14.57%	Neutral ★★★☆	58.25%
7.82%	Attractive ★★★☆	3.62%
0.00%	Very Attractive ★★★★	0.00%
24.77%	Unrated	0.00%
1.09%	Cash	

Holdings as of 11/30/11. Cash as of 12/31/11. Ratings as of 01/31/12.



Active Management Commentary

- FLRUX allocates 51.75% of its value to Dangerous-or-worse-rated stocks while XLU allocates 38.13%.
- FLRUX allocates 7.82% of its value to Attractive-or-better-rated stocks while XLU allocates 3.62%.
- 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 FLRUX adds value versus its ETF benchmark XLU.

Return - Annual		Top 5 Holdings	Key Mutual Fund Statistics				
Year to Date	-0.29%	NiSource Inc	NI	Net Assets(mm)	\$32.40	Category	Utilities
1 Year	0.91%	American Water Works Co Inc	AWK	NAV	\$23.98	Mgmt Co	Meeder Asset Management Inc
3 Year	16.13%	Questar Corp	STR	Benchmark	XLU	Manager	Team Managed
5 Year	2.52%	National Fuel Gas Co	NFG	# of Holdings	36	Tenure	-
Inception	7.54%	MDU Resources Group Inc	MDU	Initial Min	\$2,500	Inception	06/21/95

Data from Lipper, a Thomson Reuters Company, and New Constructs, LLC.

Details on Total Annual Costs Rating are on page 2.

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Total Annual Costs Rating and Ranking

Rating	Total Annual Costs		Category Rank	
****	2.54%	35.64%	23 of 39	

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	FLRUX	Benchmark: XLU	
Front-End Load	0.00%		
Expense Ratio	2.30%	0.22%	
Back-End Load	0.00%		
Redemption Fee	0.00%		
Transaction Costs	0.24%		
Total Annual Costs	2.54%	0.22%	

- To justify its higher Total Annual Costs, FLRUX must outperform its ETF benchmark by 2.35% annually over any holding period.
- 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 53%.

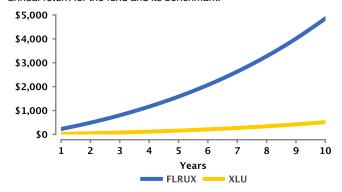
Data from Lipper, a Thomson Reuters Company, and New Constructs, LLC.

Reported Costs vs Benchmark: as of 12/22/11

	FLRUX	Benchmark: XLU
Front-End Load	0.00%	
Expense Ratio	2.05%	0.20%
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 \$801.90 for FLRUX and \$79.70 for XLU. 10-year Accumulated Total Costs are \$4,852.54 for FLRUX and \$514.10 for XLU.

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 here) is the same as our Stock Rating (details here) except that we incorporate Asset Allocation (details here) in the Portfolio Management Rating. The Total Annual Costs Rating (details here) 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
	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%

02/01/12

New Constructs® - Profile

Incorporated in July 2002, New Constructs 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

- 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.
- 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 <u>presentation to the Senate Banking Committee</u>, 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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