

## **Independent Accountant's Verification Report**

Mr. William Sowell  
Sowell Management Services:

We have examined whether (1) Sowell Management Services (the "Firm") has complied with all the composite construction requirements of the Global Investment Performance Standards (GIPS® standards) on a firm-wide basis for the periods from April 1, 2009, to March 31, 2014, and (2) the Firm's policies and procedures are designed to calculate and present performance results in compliance with the GIPS standards as of March 31, 2014. The Firm's management is responsible for compliance with the GIPS standards and the design of its policies and procedures. Our responsibility is to express an opinion based on our examination.

### **Scope of Work**

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and, accordingly, included examining, on a test basis, evidence about the Firm's compliance with the previously mentioned requirements; evaluating the design of the Firm's policies and procedures previously referred to; and performing the procedures for a verification required by the GIPS standards and such other procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

### **Opinion**

In our opinion, in all material respects,

- the Firm has complied with all the composite construction requirements of the GIPS standards on a firm-wide basis for the periods from April 1, 2009, to March 31, 2014; and
- the Firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS standards as of March 31, 2014.

We have not been engaged to examine and did not examine any presentation of the Firm's composites for any period, including any presentations that may accompany this report, and accordingly, we express no opinion on any such performance.

*Ashland Partners + Company LLP*  
Ashland Partners & Company LLP  
January 23, 2015