

THE WALL STREET TRANSCRIPT

Connecting Market Leaders with Investors

Investing in Growth Companies



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SECTOR – GENERAL INVESTING

TWST: Why don't you start with an overview of Formula Growth Ltd. and your investment philosophy there?

Mr. Kelly: Formula Growth was founded in 1960 by someone generally considered the Dean of growth stock investing in Canada, John Dobson. He started the original Formula Growth Fund with ten individuals. Each guy put up \$10,000 for a total of \$100,000. John decided that they would invest anywhere other than Canada to diversify away from the resource and bank stocks that dominated the Canadian stock market then as they still do today. Essentially they said, "Let's find some other aggressive growth stocks somewhere else in the world". Initially the obvious place to look was in the United States. At times the group invested elsewhere around the world but eventually the group settled in on the close to home United States markets.

That original \$100,000 represented a price per share of \$9. Today these same shares are worth \$3,000. The Standard & Poor's total return over the last 50 years has compounded at just over 9% and we have compounded at just over 12% for 50 years. An original investor who put up \$10,000 in 1960 today has over \$3,000,000.

We have focused on the United States markets for the past thirty-five years. We like the American market because it offers an almost infinite amount of ways to play all sorts of different businesses. These same US companies give you worldwide exposure as well as many of them operate with big international businesses. So you can get international bang for the buck by buying US listed stocks. We like to focus on growth stocks or companies that grow their earnings quickly. We want stocks that can grow their earnings per share at above the

average rates and we like to pay below average multiples for these above average rates of growth.

It is tricky to find these aggressive growth stocks. You have to beat the bushes to find them. They can be either newly emerging growth stocks that come out of new initial public offerings or they can be companies that are re-emerging with a new product, a new set of management or a new business line. The trick for us is to determine whether the story is believable, whether it's going to happen as scripted and be in front of the story early so we are there before the Street is aware of the idea. Often we're betting against some of the skepticism that normally surrounds growth stocks. You have to be careful as many growth business plans don't come true. In order to help our batting average we do a lot of "kicking of the tires". We do this due diligence with a team in New York and a team here in Montreal and soon a team in Hong Kong but more on that later. Both teams travel extensively. The headquarters of Formula Growth is still in Montreal. Our New York office opened recently. With the recent crash in the markets we felt it important to be aggressive about our own internal growth plans when others in the investment business were being conservative and retrenching. As result we went ahead at the lows in the market and opened our New York office in 2008. The intention was to deepen our research efforts as well as sharpening our business development efforts in the States.

There are about 7,000 or 8,000 public companies in the US. Probably, half are not really investable as they are dollar stocks, companies losing lots money or companies with market caps that are tiny. On the other hand there are probably 3,000 or 4,000 stocks that are investable. At any one moment we are looking at all of those stocks. We comb through them to find the 100 or so stocks that might form a portfolio for us.

There is never a shortage of good ideas to invest in. Because we've been in business for 50 years, we have a very deep database on many of the investable companies in the US we can cull from. Additionally we deal with a 100 different brokers on the sell side from the largest all the way down to regional brokers that might be located far away from New York City in Minneapolis or Little Rock. It is important to talk to everyone as you never know where the next great stock will come from. Likewise, because we have been in business so long we have a very large buy side network of friends and peers we talk to. These are people with whom we compete, I suppose, but for the most part it's really just friendly competition. It is quite a fraternity among the people who buy growth stocks. We share ideas and trade information with our peers on the buy side as long as it is a two way street. All of these ways form the basis for our idea flow. Essentially, Formula has a tremendous information network that allows us to quickly get to the bottom line of a story.

We have an in-house team of about ten people who do nothing but research stocks, model stocks, screen for stocks and talk to management teams in order to discern whether we are in front of a good stock. Our New York office spends obviously a lot of time in New York meetings chasing down management teams that go through New York. We also spend a lot of time on the road visiting companies at their headquarters when we feel they are interesting.

Growth stock investing is very volatile. Usually these companies have higher beta or in other words greater price moves, up and down. Growth stock investing is like trying to hit home runs as

For the first 40 years of its history, Formula was simply a long-only shop investing in aggressive growth equities. Given the inherent volatility in our long only process and with the culmination of the bubble stock valuations in the year 2000 we came to the conclusion that we needed to offer our clients a different and less volatile product. We needed a product that took less risk and therefore would have less volatility. We developed a hedge fund platform. We came up with a long/short equity Fund where we avail ourselves of the research process we use to buy stocks long but also use the same research to sell stocks short. We sell stocks short when our research indicates that stories are unspooling and the stock is likely to decline.

Our focus for the last 8 years has been on building out our long/short business. Our Formula Growth Hedge Fund is a wonderful complement to our long only business or the original Formula Growth Fund. We simply have added to the hedge fund process an element of market timing and a portfolio of shorted stocks in order to mitigate the risk that's associated with investing in the stock market. Additionally we control risk by the strict use of price stops to help avoid large losses in any one holding.

Today we manage about \$500 million. Of this amount about 60% is in our long/short hedge fund. The customers are voting with their feet these days and seem to prefer the relative safety of our Hedge Fund.

A hallmark of Formula is we believe that slow growth in the asset base is best for all the customers. Most of the growth in assets under management has been through capital appreciation, not from marketing. We don't like to dilute our best ideas over a very broad base of assets as you won't get much bang for the buck or ROI from the investment unless

Highlights

Randall W. Kelly says that Formula Growth was for many years a long-only shop investing in aggressive growth equities. Given the inherent volatility in the long-only process, however, the firm decided that it needed to offer clients a different and less volatile product, so it developed a hedge fund platform using the same research process and research to buy stocks long and sell stocks short. A hallmark of the firm is that slow growth is the best asset base for all clients and most of the growth in assets under management has been through capital appreciation, not from marketing. He has called the present decade a decade of despair, caused by over-leveraging and inflated asset bubbles bursting. He thinks that 2009 represented the start of a turnaround. It takes time to rearrange businesses and to plan a transition into new businesses with new levels of growth, but he is confident that this is happening in the US economy and that the next decade will be rewarding for Formula Growth. Companies include: [JinkoSolar \(JKS\)](#); [Mindspeed \(MSPD\)](#); [Entropic Communications \(ENTR\)](#).

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opposed to singles. In growth stock investing diversification is critical. Our own results in our long only Fund have been certainly very volatile over the years. We are not like investing in an index. Our long only Fund will continue to have a lot of volatility. As in the past, we are going to do very well in bull markets and we are going to do poorly in bear markets. But we know that in the aggregate these bull and bear market returns will strongly out-perform the market as we have over the past 50 years.

you own a ton of the stock. Owning too much of anything can be a big mistake if you are wrong hence why we believe in diversification and a nice tight asset pool.

We like the CEOs of those companies we own to own a lot of their own stock so they have a very vested interest in making sure the company does well. We do the same thing at Formula. Of the assets under management around 10% is owned by the people who work here. This goes from the secretary all the way up to me the CEO. We all eat our own cooking.

TWST: How have the last 12 months been for this arena?

Mr. Kelly: Actually, the last 12 months have been pretty good. I am pleased to report we just passed our 50th anniversary June 30th, 2010, as the firm was founded in 1960. We're very proud of the fact that we have now been in business for 50 years and we are very pleased with our returns over those 50 years, where we've outperformed the market by close to 300 basis points. I remain very proud of the organization and the kind of work that we're doing here. Our per-

TWST: You have described the present decade as the decade of despair. Do you still have that view?

Mr. Kelly: I am still of that view looking backward but as I look forward to the next ten years I am optimistic. Remember we were up close to 40% in 2009 and I believe was the beginning of a prosperous, new decade for stocks in the US. I think the US stock market has spent enough time in purgatory from 1998 to 2008. Hopefully 2009 is the beginning of a turnaround. Historically these turnarounds in the stock

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formance since the last time we spoke has been solid. A year ago when we spoke stocks were rallying off the bottoms of March. We closed out 2009 with a very strong year, up close to 40% across the board in our hedge funds and our long-only fund.

So far this year through July we are up about 3%. This return is substantially ahead of the market. I think the S&P is down about 1% through July and the Dow is probably flat. So things are pretty good though it has been a tumultuous year so far in 2010. The market took a turn for the worst in May and June; it came back quite strong in July, but is weak again in August. The concerns are similar to those of last year. Twelve months ago it was the fear of the recession we were living through while today it is the fear of a double dip recession re-occurring.

We continue to feel this is just a plain, old, garden variety recession. Clearly the recession last year was much deeper and tougher than normal due to unprecedented leverage everywhere. It is logical to

market are not obvious. Usually headlines are very bleak. Recessions never end as quickly as people think they will end. There is always doubt and naysayers questioning whether business will ever come back. Wall Street and financial types on CNBC can be especially impatient. It takes time to rearrange businesses and to plan and transition into new businesses with new levels of growth. I'm confident this is going on now in the US economy and that the next ten years for Formula Growth will be rewarding.

We conclude the decade of despair was caused by over-leveraging and inflated asset bubbles bursting. The bursting of these bubbles over the past ten years has taken its toll on the confidence of investors and for that matter the confidence of the average American citizen. As result most investors remain very pessimistic about stocks. I think the current administration's anti-business attitude is adding to the current malaise and lack of confidence. There are massive amounts of cash sitting idle in either banks or corporate treasuries. This cash is not being

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assume that an economic recovery will take longer to get established. Consumers, businesses and governments around the world over leveraged and binged on the back of cheap money and rapidly inflating asset bubbles. It began with stocks and ended with real assets like houses and commodities. This over leveraging has to unwind and we think that the net effect of this unwinding will haircut global growth and take quite some time to occur. We think at this stage the stock market already reflects much of this unwinding because stocks reflect positives and negatives very quickly --- unlike many other asset classes. We think stocks are cheap and bonds are expensive. It feels like we are pretty much alone in this view because there doesn't seem to be a lot of enthusiasm for the stock market these days. Given current recessionary fears, bonds are in great demand. Cash is king, as people are very fearful. People are so fearful that gold is back in vogue. This is interesting as both bonds and gold have virtually next to no yield while stocks have great earnings and dividend yields.

invested in productive assets and new hires because there is no confidence. At the same time consumers are re-liquefying and are afraid to spend. This is not a right recipe for strong economic recovery. This lack of confidence manifests itself in negative small business formation, and we all know that that's where job growth really comes from. In this sort of climate people are just not willing to invest.

Because the US had been struggling for quite some time the Obama administration was elected to effect "change". Unfortunately the administration has been too focused on expanding government, redistributing more from the rich to the poor and stimulating aggregate demand through more government spending. Of course this is proving to be folly and is simply very bad public policy. Instead of trying to work with business the administration continues to layer on massive, smothering regulations that are undermining almost all industries. No one has been immune. Large industries like healthcare, financials and energy have been hit hard. I think I spoke last year that we're making money in education stocks. Not

anymore. The education space is a glaring illustration of where Congress and the Senate are going off half cocked even in small industries like education. New rules being bantered about are destroying the for-profit education industry by creating enormous uncertainty. It is exactly the space where you think the government would be trying to help as unemployment levels remain persistently high. There are a lot of people who need to be retrained and learn new trades in order to find new opportunities in new, emerging businesses.

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Similarly the financial industry has had a rocky ride. Credit card processors like **Visa** (V) and banks like **Bank of America** (BAC) and **Citibank** (C) have been hammered. Healthcare stocks are much maligned now because of healthcare reform. Healthcare service providers do not know what the ground rules will be when the reforms are finally implemented. As a result the whole industry is on hold. Even small business wants to remain really small because if they hire more than 50 individuals they will be subject to greater taxation for healthcare. It is just stupid. There is a myriad of bad public policy in the States that is causing uncertainty in the investment community. It is little wonder that people are sitting on their hands and not investing. Corporate CEOs understandably lack the gumption to pull the trigger on hiring or spending until today's economic and policy fog lift.

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Since we last spoke a year ago earnings have been very good in corporate America and in our portfolio of holdings. Frankly, given the depth of the recession, earnings have on balance been over-delivered upon. While we returned 37% to 40% year last year depending on the account, the stocks remain about as cheap today as they were a year ago. This is because the earnings have increased as strongly in percentage terms as the stocks rose. The same can be said for the earnings for indexes like the S&P. Earnings are coming through. Corporate America is doing well. The only problem with the growth in earnings since last year is it is being achieved mostly through cost cutting and not through revenue growth. Low confidence and conservatism causes CEOs not to be aggressive about investing to grow the top line. I think we will remain in a slow growth GDP environment, with a slowly recovery economy, persistently high unemployment and a gradual return back to normality over the coming next year or two. In this sort of environment we will likely get nice returns from stocks because stocks are cheap and business is not that bad yet returns will remain volatile and lumpy.

TWST: You have a hedge strategy too. How has the short portfolio done?

Mr. Kelly: Actually, the short side has been difficult. The difficulty we have been having on the short side gives us confidence in how cheap stocks are. As I think about the last 12 months, we've made some money on the short side, but not a lot. It has not been an easy environment to short because stocks generally are not overpriced, and for the most part companies are delivering. On the short side it was a nice envi-

ronment going into 2007 and 2008. We made lots of profits on our short book 2007 and 2008 but have not been super profitable in 2009 and 2010. It has been very lumpy on the short side. This year we made money on the short side in May, we probably covered too soon in June and the move back down in August has been very quick and hard to take advantage of. Remember in our long/short equity funds we are directional, we don't run market-neutral equity funds. Our hedge fund takes a directional view on the market. Right now we are more long-oriented than we are short with the portfolio exposure at about 70% net long.

Let me change gears for a moment. I spoke last year about the fact that we found that we could get some international exposure through the US markets by investing in US stocks that do business multi-nationally. Today there are 7,000 or 8,000 public companies in America. There

used to be more like 10000. There has been a reduction of stocks in America. Clearly part of the reduction in investable names in the American market comes from the fact that it has been tough for the US capital markets since the bubble in 2000 and from the fact that the US economic environment has been a slow growth one. Because it has been difficult to find robust growth in recent years we began incubating a global fund two years ago that will have an orientation that focuses on Asia-pacific where we think there will be lots of growth for decades. This fund is called the Formula Growth Global Opportunities Fund. I spent personally quite a bit of time in China this year on multiple trips trying to get a better grip on the stories there. We've been investing with modest exposure to the geography over the last 18 months with some success. We have seen enough to know we should push forward with this project.

As you know the Asian markets have had their own difficulties over the last 12 months. The idea as we incubate this global fund is to get our feet wet and get our investment process firmed up. We have concluded in order to be a serious player in global growth investing you need to have

presence there and dedicated personnel. We want to invest in Asia by applying the investment process Formula's been using in the US for the past 50 years. Along these lines we have a new hire coming on board named Nelson Cheung. He has a superb background in global investing. He is an industry veteran and has been a global investor for ten years with two Canadian funds. Additionally we just inked a deal with a joint venture partner in Hong Kong giving us a presence in Hong Kong. As you know, we are Montreal based but we do much of our work out of our New York office. Similarly much of our global work will now be out of our Hong

"The world seems to be narrowing down to almost a kind of G2 between the US and China so we expect our global efforts will mostly concentrate in these two geographies. We will likely ignore the more mature Japan though we recognize there is a bit of debate these days on which is bigger in US dollar terms; China or Japan. We see better growth in China. They are both about 5 trillion US in GDP terms."

Kong office. Formula believes to be successful at investing you need "feet on the street". As well many Asian growth companies come through New York to raise capital. I think we'll have the landscape very well covered between our NYC and Hong Kong offices. Formula Growth is about growth. We are looking for growth anywhere and at any size market capitalization. Usually we find the best opportunities in the small to mid-cap space. The bottom line is we are about growth and we need to be where the growth is. With growth being hard to come by or only happening in fits and starts in the States, we want to go where the growth is and the growth is in the Asia-Pacific region. We think our global efforts can double the universe of available stocks we look at. There are 3,000 to 4,000 investable stocks between the Hong Kong, Taiwan, Singapore, and Malaysian markets. There are a lot of interesting sized companies in these markets with interesting opportunities in front of them.

"JinkoSolar is a Chinese solar panel maker, a vertically integrated one, well diversified between wafer cells and modules. We love their low-cost structure. Most of all, we love their low price earnings ratio and their growth rate in EPS. It sells for less than eight times this year's earnings."

We're quite excited about doubling the available universe of stocks we can look at between the American and the Asian markets, not to mention the odd stock we might find from elsewhere in the world. The world to us seems to be narrowing down to almost a kind of G2 between the US and China so we expect our global efforts will mostly concentrate in these two geographies. We will likely ignore the more mature Japan though we recognize there is a bit of debate these days on which is bigger in US dollar terms; China or Japan. We see better growth in China. They are both about 5 trillion US in GDP terms.

Finally, I've found in my visits to Asia that the markets are not as efficient as the American markets so I think there is a lot more opportunity to make money. We are really quite excited about this new global product. We will be marketing the global fund actively in the coming year.

Sorry about the shift in gears but our global fund is something new between this year and 12 months ago.

TWST: Any other shifts in emphasis like interest in certain industries or sectors?

Mr. Kelly: We've made some good money in the last six months or so in technology stocks. A couple of favorites these days; one would be **JinkoSolar (JKS)**. It's a Chinese solar panel maker, a vertically integrated one, well diversified between wafer cells and modules. We love their low-cost structure. Most of all, we love their low price earnings ratio and their growth rate in EPS. It sells for less than eight times this year's earnings. We love their low cost structure,

1-Year Daily Chart of JinkoSolar



Chart provided by www.BigCharts.com

we love their low-cost polysilicon inventory and their vertical integration. They are relatively new to the solar industry space. We think they will build their brand as they go forward and will therefore get better recognition from the Street. A reasonable target for the stock would be ten times \$2.50 or \$25 per share. The stock has had a great run and is now trading around \$20. We own quite a large position in the new global fund.

Mindspeed (MSPD) is an American company actually, but big part of their business is in China. As I said earlier you can get global exposure via companies that are located in United States. **Mindspeed** happens to be located on the West Coast in California and it's a Fabless semiconductor company. They make communication chips that go into the fiber network in China. They are part of the build out of the telecommunication network architecture in China. It is a very cheap stock. They just blew away their second quarter numbers and they have

a nice balance sheet. We've made some significant profits in this stock and still think it's cheap at this price. It has backed up a little bit in this weak market of August and is currently selling for 7 times next year's EPS estimate

1-Year Daily Chart of Mindspeed



Chart provided by www.BigCharts.com

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Another company we're really quite bullish on in the technology space, again in the semiconductor space is a company called **Entropic Communications** (ENTR). The company is located here in the United States. They sell chipsets that are built into set top boxes that are sold or rented to their subscribers by the big video service providers like the cable and satellite TV companies. They sell what are termed MoCA chips. MoCA means Multimedia over Coax and is rapidly becoming a standard. These chipsets allow you to PVR to and from any room in your house over existing coax cable to any other room in your house that has a TV in it. Essentially if you've recorded a television show on your PVR in the media room you can replay it on the bedroom TV remotely by using Entropic Communications chipsets. This MoCA standard and the chipsets that Entropic makes are finally gaining traction two years after the company came public. Consumers were in no mood to embrace new technology and a new set top box in the middle of last year's recession. Today the big video providers are trying to distinguish themselves from each other while trying at the same time to jump start their top line growth by pushing new services. They are beginning to heavily promote MoCA. Consumers seem ready to try the new service. **Entropic** just had a very robust quarter, blowing away the Street estimates. We look for more of the same in coming quarters. The stock is trading around \$7 and we think it can earn 80 cents next year.

JinkoSolar is new, a recent IPO, but **Mindspeed** and **Entropic** have been around awhile. **Entropic** came public maybe two years ago but at the time of the IPO consensus thought then was the world was ending. Of course the stock went straight down post IPO. If you stay on

top of these stories and don't lose your nerve you can find great entry points to buy these stocks. You can make a lot of money when others are fearful. Formula is very good at doing this. We have about three thousand electronic files where we log all our proprietary research. We spend all day talking to company managements, attending conferences whether they are sponsored by brokers or trade organizations. If you stay on top of these stories or scripts even old companies can become new companies and give you opportunity to make money.

This is why we are excited about China. I think we can take a lot of the skill sets that Formula has been applying in the US markets for the last 50 years and apply them to Asia. The team has been together for a long time now. We can take the skill set of understanding businesses quickly that we have already seen in America over the past thirty years and apply it to China. What has been built by business in America is now being replicated in Asia; whether it's restaurants, telecom companies, technology companies or transportation companies. It's almost like *deja vu*; we've seen these businesses emerge in America over the years and they're now emerging in China. New quick growing companies are our sweet spot and we expect to see lots of these kind of companies emerge in the Asia-pacific region.

1-Year Daily Chart of Entropic Communications



Chart provided by www.BigCharts.com

TWST: Tell us about your sell discipline. I know you have strict price targets.

Mr. Kelly: We manage the portfolio with very strict price targets and very tight qualitative scripts or stories associated with each stock. If a management team tells us they are going to do ABC and they do XYZ, we're going to sell the stock. We model everything we own and if we expect the company to earn \$0.10 in a quarter and if it earns \$0.06, we are going to be very slavish about why the company missed the EPS target and likely sell the stock. Also, in order to control risk, we run with very tight stops to protect the downside. If a stock price moves down and we don't quite understand it but it

moves down significantly we are going to sell the stock and ask questions later. On the other hand if a company is successful and hits our upside price targets based on our modeling, we are very strict to sell. To manage money successfully you have to have a tough sell discipline. You have to stick to your disciplines and it's one of the key features of Formula Growth.

"Entropic Communications sell chipsets that are built into set top boxes that are sold or rented to their subscribers by the big video service providers like the cable and satellite TV companies. They sell what are termed MoCA chips. MoCA means Multimedia over Coax and is rapidly becoming a standard. Entropic just had a very robust quarter, blowing away the Street estimates."

TWST: What is the outlook for mergers and acquisitions going forward? Is that a part of your process to look at that?

Mr. Kelly: We don't run a specific hedge fund product that looks for M&A or event-driven opportunities but we are always on the hunt for something that gets taken out at a premium. One of the things that I worry about a little is that I think we have some cheap stocks in the portfolio on the long side. Some of these stocks are so cheap that private equity should be nosing around looking to buy the whole company. We think that stocks are very cheap and that some good companies will be taken private at valuation levels that will not fully reflect their full potential. These days we are seeing more and more take outs being announced. There is close to \$2.0 trillion of cash on corporate balance sheets today. As CEOs and Boards regain their confidence they

a good idea in front of us. Overall we control risk by being a bottoms-up manager. We are careful with our investments, we script everything, we talk to management, we talk to competition, we try to model these companies as best we can, and we run a diversified portfolio. We try to get the story straight. We know why our stock is going to go up if it's a long

or down if it's a short. We constantly check in and reassess our own opinions and conclusions and we check our conclusions against our network of buy side friends and sell side brokers and analysts. We are constantly paranoid. Top-down we might sometimes use an overlay in order to take some risk out of the portfolio. We usually use an ETF or something that gives us some quick exposure in the right direction but only when we can't readily find a suitable stock selection.

TWST: Is there anything that you'd like to add?

Mr. Kelly: I think in conclusion once we get this anti-business attitude out of the way stocks will surprise people to the upside. Perhaps a change in sentiment comes with the upcoming mid-term elections in November. Government leaders need to stop playing the blame game and get back to the business of business in America. America is all about business

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will go on the hunt and use this cash to grow their businesses. We are likely to see more and more acquisitions and mergers as we exit 2010 and enter 2011. At the same time we will also likely see an increase in stock buy backs as stock valuations are too low especially when one considers the yields on cash and bonds. Stay tuned there will probably be lots of action in the world of M&A.

TWST: What about all these risk factors? How do you try to control risk at the portfolio and individual stock level?

Mr. Kelly: As I said earlier, we have some slavish disciplines using stops. We are going to sell a stock on a price break and ask questions later, because you're probably simply wrong in your script. We control risk selling stocks as they hit our targets and models. On the buy side, we're very careful controlling risk by making sure we have a good entry point when we buy. We're not going to buy stocks that are running. We're not momentum players. We think that can be folly, especially in this kind of climate. It doesn't make sense to chase a stock. We will not buy anything where we don't see 30 to 50% upside in the near-term. The same goes on the short side. If we are uncomfortable with the market we are not afraid to run with cash. Currently we have net cash equal to 30% in our portfolios. We'd rather have the cash in the bank if we don't have

and it will be a great place to do business again once everyone starts rowing the boat in the right direction. Clearly Americans are in a period of malaise and self-doubt. This is not the first time nor will it be the last. As has happened in the past time and again I expect the resilient US markets to rebound stronger than ever. I am excited about the next 50 years. I am particularly excited about our new global initiative as I think it's going to add measurably to our investment toolbox here at Formula. I remain pumped up, optimistic and bullish. Since the beginning of 2009 we are up more than 40% so I think my confidence is well placed. I am convinced it's the beginning of another great stretch for Formula Growth.

TWST: Thank you. (PS)

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