RAYMOND JAMES

Investment Strategy

Jeffrey D. Saut, (727) 567-2644, Jeffrey.Saut@RaymondJames.com	November 2, 200
Investment Strategy	

Dow Theory Sell Signal?

We arrived in San Francisco around noon last Monday. After a quick lunch with friends in Atherton, followed by another short visit with more friends in Los Altos, Cheryl and I pulled up to the hotel De Anza in San Jose (a wonderfully refurbished 1920s hotel with a great Italian restaurant named La Pastaia). After checking in I warped into the Internet only to find my email "box" slammed with questions about Dow Theory. Those questions were kindled by some alleged pundit who appeared on CNBC and declared that a Dow Theory "sell signal" had been rendered. While it is true that there are numerous practitioners of Dow Theory, over the years I have learned that many of them do not interpret the theory the way I was taught.

Charles Dow began publishing *The Wall Street Journal* in 1889. Considered a very astute stock market observer, Dow wrote a number of editorials wherein the concept of Dow Theory originated. Those theories were expanded on by S.A. Nelson, in collaboration with Charles Dow, in a series of WS/editorials titled, "The ABCs of Stock Speculation." At the end of those quips resided a footnote that read "Dow Theory." Shortly after Dow's death, William P. Hamilton became editor of the WS/and wrote hundreds of similar editorials, leading to his epic book "The Stock Market Barometer." It was Hamilton who first wrote about the "confirmation principal" between The D-J Industrials (DJIA) and The D-J Transports (DJTA), which to me is the bedrock of Dow Theory. Following Hamilton's death in 1930 his student, Robert Rhea, began publishing a market letter titled "Dow Theory Comment." Rhea "called" the bottom of the stock market in July of 1932, as well as the subsequent downturn of 1937. Rhea died in 1939, leaving Dow Theory fallow until the 1940s when the great Dow Theorist George Schaefer resurrected it. To me, these folks were the "expanders" of Charles Dow's original stock market observations. And to my knowledge the only market maven of today that really understands, and adheres to, the brilliant work of those Dow Theorist icons is Richard Russell of "Dow Theory Letters" fame.

While I could certainly respond as to why there was NO "sell signal" last Monday, Dick Russell explained the situation in his always excellent letter dated October 26, 2009 (the brackets are my inserts). To wit:

"The secret of the direction of the great primary trend of the market lies in the secondary reaction and what happens AFTER a secondary reaction. A secondary reaction usually takes three weeks to three months in duration while correcting one-third to two-thirds of the previous move. Since the March low, we have yet to experience a true secondary reaction. And I'm wondering whether we could be on the edge of a secondary reaction now. Following a secondary (reaction), if BOTH Averages (Industrials and Transports) rise to new highs, the primary trend is taken to be bullish. Following the lows of a secondary reaction, there will be a rally. If (that) rally fails to take both Averages to new highs, and the Averages then turn down and break to new (reaction) lows, the primary trend is taken to be as bearish. Secondary reactions often start with one of the Averages sinking while the other Average continues to the upside."

Well said Dick Russell. We, therefore, told our callers, "How can you have a sell-signal when we have not even experienced a downside secondary reaction since the March lows?" Indeed, you need a downside reaction, which "sets" the reaction lows, followed by a rally. If that rally fails to make a new reaction high, and subsequently breaks below the aforementioned reaction lows, then (and only then) will we have a Dow Theory "sell signal," at least as I understand Dow Theory.

For the record, the recent closing price reaction "highs" are 10092.19 for the DJIA and 4045.11 for the DJTA. Measuring from those highs suggests a one-third "give back" would leave the DJIA at ~8910 and the DJTA at ~3412. That would be consistent with our comments in which we stated that we thought any correction would probably be contained between the 50-day moving average (DMA) and the 200-DMA. In the Dow's case the 50-DMA is currently at ~9718 and the 200-DMA at ~8593, while the Transport's 50-DMA resides near 3613 and the 200-DMA around 3269. Of course the markets can do anything, but I would be surprised if the Averages correct by more than one-third. Nevertheless, we have been pretty cautious since the latter part of September, fearing that the vacuum created by the July to September melt-up might get "filled" to the downside once quarter-end window dressing is over. Initially that strategy looked good, and then it looked bad; but all said, the Averages are only marginally below where they were when we turned cautious. Yet, we are still cautious.

Please read domestic and foreign disclosure/risk information beginning on page 3 and Analyst Certification on page 4.

Raymond James Investment Strategy

In the way of a follow up to last week's comments about, "farmland being the only asset class left behind by the rally in everything;" most of the publically traded Ukrainian agricultural companies we gave to our liaison desk for your consideration turned out to be available only to institutional investors. As for the companies mentioned in the *Barron's* article that boost agricultural productivity, the readily available ones to U.S. investors are: Agrium (AGU/\$46.95), Archer Daniels (ADM/\$30.12), Bunge (BG/\$57.06), Monsanto (MON/\$67.18), and Mosaic (MOS/\$46.73). Sticking with the agricultural theme, this week's *Barron's* had another ag-related story titled "Hogs Climb Out of the Mud." The article speaks of the two-year nightmare hog producers have experienced as prices plunged while feed prices rose. The article concludes that the bottom is now "in" for hog prices. We wrote about this same scenario late last summer, noting that many hog farmers were slaughtering their breeding-stock because they couldn't afford to feed them. Our conclusion was that when the cycle turned, and demand picked up, hog prices might rise faster than most expect since it takes roughly 18 months to rebuild one's breeding stock. Our vehicle of choice to play this theme was the iPath DJ-UBS Livestock Exchange Traded Note (COW/\$28.20), which is ~68% live cattle and ~32% lean hogs. However, like our stock trading strategy over the past four weeks, COW is not much higher now than it was when we first mentioned it. Still, we like the hog/cattle theme.

Coincidentally, in Friday's WS/there was yet another article about agriculture titled, "Late Harvest Sows Problems for Farmers." Said article speaks to this year's late harvest due to wet weather. As written, "On Monday, the U.S. Department of Agriculture said just 20% of the corn crop had been harvested in the major corn producing states, compared with 58% on average by this point in 2004 through 2008." Moreover, the grain crop is just too wet, and therefore subject to mold, especially in the warm delta region. Wet conditions also suggest a late start for next spring's planting, as well as the potential of compacting dirt in fields that could hurt future crop yields. Meanwhile, global grain inventories are at record lows. Hereto, we wrote about this situation months ago and recommended a number of vehicles playing to this theme like: PowerShares DB Agriculture Fund (DBA/\$25.57), GreenHaven Continuous Commodity Fund (GCC/\$25.10) and iPath UBS Grain ETN (JJG/\$38.00). As always, the terms and details of such funds should be vetted thoroughly before purchase.

The call for this week: When the going gets tough the tough go on the road. That's what we did last week and that's what we are doing again this week, so once again these will likely be the last strategy comments of the week. Nevertheless, last week's "wilt" left everything we follow lower except for the U.S. Dollar Index. And while the DJIA (9712.73) averted a loss in October, none of the other indices we monitor did. Indeed, the S&P 500 (SPX/1036.19) slid 3.9%, bringing its two-week retreat to 5.6%. While our sense is that we are into a secondary correction, our proprietary overbought/oversold indicator is VERY oversold and the number of S&P 500 stocks that are above their 50-DMAs has fallen from more than 90% to 33.2%. Consequently, we continue to think it is a mistake to get too bearish. Ergo, until Dow Theory "tells us" otherwise, we think the primary trend remains UP, and we continue to trade, and invest, accordingly.

Raymond James Investment Strategy

Important Investor Disclosures

Strong Buy (SB1) Expected to appreciate and produce a total return of at least 15% and outperform the S&P 500 over the next six months. For higher yielding and more conservative equities, such as REITs and certain MLPs, a total return of at least 15% is expected to be realized over the next 12 months.

Outperform (MO2) Expected to appreciate and outperform the S&P 500 over the next 12 months. For higher yielding and more conservative equities, such as REITs and certain MLPs, an Outperform rating is used for securities where we are comfortable with the relative safety of the dividend and expect a total return modestly exceeding the dividend yield over the next 12 months.

Market Perform (MP3) Expected to perform generally in line with the S&P 500 over the next 12 months and is potentially a source of funds for more highly rated securities.

Underperform (MU4) Expected to underperform the S&P 500 or its sector over the next six to 12 months and should be sold.

Out of approximately 762 rated stocks in the Raymond James coverage universe, 46% have Strong Buy or Outperform ratings (Buy), 46% are rated Market Perform (Hold) and 9% are rated Underperform (Sell). Within those rating categories, 24% of the Strong Buy- or Outperform (Buy) rated companies either currently are or have been Raymond James Investment Banking clients within the past three years; 15% of the Market Perform (Hold) rated companies are or have been clients and 10% of the Underperform (Sell) rated companies are or have been clients.

Suitability ratings are not assigned to stocks rated Underperform (Sell). Projected 12-month price targets are assigned only to stocks rated Strong Buy or Outperform.

Suitability Categories (SR)

Total Return (TR) Lower risk equities possessing dividend yields above that of the S&P 500 and greater stability of principal.

Growth (G) Low to average risk equities with sound financials, more consistent earnings growth, possibly a small dividend, and the potential for long-term price appreciation.

Aggressive Growth (AG) Medium or higher risk equities of companies in fast growing and competitive industries, with less predictable earnings and acceptable, but possibly more leveraged balance sheets.

High Risk (HR) Companies with less predictable earnings (or losses), rapidly changing market dynamics, financial and competitive issues, higher price volatility (beta), and risk of principal.

Venture Risk (VR) Companies with a short or unprofitable operating history, limited or less predictable revenues, very high risk associated with success, and a substantial risk of principal.

Analyst Holdings and Compensation: Equity analysts and their staffs at Raymond James are compensated based on a salary and bonus system. Several factors enter into the bonus determination including quality and performance of research product, the analyst's success in rating stocks versus an industry index, and support effectiveness to trading and the retail and institutional sales forces. Other factors may include but are not limited to: overall ratings from internal (other than investment banking) or external parties and the general productivity and revenue generated in covered stocks.

Registration of Non-U.S. Analysts: Unless otherwise noted, the analysts listed on the front of this report who are not employees of Raymond James & Associates, Inc. are not registered/qualified as research analysts under FINRA rules, may not be associated persons of Raymond James & Associates, Inc., and may not be subject to NASD Rule 2711 and NYSE Rule 472 restrictions on communications with covered companies, public companies, and trading securities held by a research analyst account.

Raymond James Relationships: RJA expects to receive or intends to seek compensation for investment banking services from the subject companies in the next three months.

Additional Risk and Disclosure information, as well as more information on the Raymond James rating system and suitability categories, is available at <u>ricapitalmarkets.com/SearchForDisclosures main.asp</u>. Copies of research or Raymond James' summary policies relating to research analyst independence can be obtained by contacting any Raymond James & Associates or Raymond James Financial Services office (please see <u>raymondjames.com</u> for office locations) or by calling 727-567-1000, toll free 800-237-5643 or sending a written request to the Equity Research Library, Raymond James & Associates, Inc., Tower 3, 6th Floor, 880 Carillon Parkway, St. Petersburg, FL 33716.



Raymond James Investment Strategy

The views expressed in this report accurately reflect the personal views of the analyst(s) covering the subject securities. No part of said person's compensation was, is, or will be directly or indirectly related to the specific recommendations or views contained in this research report. In addition, said analyst has not received compensation from any subject company in the last 12 months.

Investors should consider this report as only a single factor in making their investment decision.

International securities involve additional risks such as currency fluctuations, differing financial accounting standards, and possible political and economic instability. These risks are greater in emerging markets.

Small-cap stocks generally involve greater risks. Dividends are not guaranteed and will fluctuate. Past performance may not be indicative of future results.

Investors should consider the investment objectives, risks, and charges and expenses of mutual funds carefully before investing. The prospectus contains this and other information about mutual funds. The prospectus is available from your financial advisor and should be read carefully before investing.

For clients in the United Kingdom:

For clients of Raymond James & Associates (RJA) and Raymond James Financial International, Ltd. (RJFI): This report is for distribution only to persons who fall within Articles 19 or Article 49(2) of the Financial Services and Markets Act (Financial Promotion) Order 2000 as investment professionals and may not be distributed to, or relied upon, by any other person.

For clients of Raymond James Investment Services, Ltd.: This report is intended only for clients in receipt of Raymond James Investment Services, Ltd.'s Terms of Business or others to whom it may be lawfully submitted.

For purposes of the Financial Services Authority requirements, this research report is classified as objective with respect to conflict of interest management. RJA, Raymond James Financial International, Ltd., and Raymond James Investment Services, Ltd. are authorized and regulated in the U.K. by the Financial Services Authority.

For institutional clients in the European Economic Area (EEA) outside of the United Kingdom:

This document (and any attachments or exhibits hereto) is intended only for EEA institutional clients or others to whom it may lawfully be submitted.

For Canadian clients:

Review of Material Operations: The Analyst and/or Associate is required to conduct due diligence on, and where deemed appropriate visit, the material operations of a subject company before initiating research coverage. The scope of the review may vary depending on the complexity of the subject company's business operations.

This report is not prepared subject to Canadian disclosure requirements.

Additional information is available on request.

The information provided is as of the date above and subject to change, and should not be deemed a recommendation to buy or sell any security. Certain information has been obtained from third-party sources we consider reliable, but we do not guarantee that such information is accurate of complete. Persons within the Raymond James family of companies may have information that is not available to the contributors of the information contained in this publication. Raymond James, including affiliate and employees, may execute transactions in the securities listed in this publication that may not be consistent with the ratings appearing in this publication.

Proprietary Rights Notice: By accepting a copy of this report, you acknowledge and agree as follows:

This report is provided to clients of Raymond James & Associates, Inc. (RJA) only for your personal, noncommercial use. Except as expressly authorized by RJA, you may not copy, reproduce, transmit, sell, display, distribute, publish, broadcast, circulate, modify, disseminate or commercially exploit the information contained in this report, in printed, electronic or any other form, in any manner, without the prior express written consent of RJA. You also agree not to use the information provided in this report for any unlawful purpose.

This report and its contents are the property of RJA and are protected by applicable copyright, trade secret or other intellectual property laws (of the United States and other countries). United States law, 17 U.S.C. Sec.501 et seq, provides for civil and criminal penalties for copyright infringement.

