



# Di Tomasso Group

**DISCLOSURE DOCUMENT**

**OF**

**DI TOMASSO GROUP INC.**

Registered Commodity Trading Advisor  
Member of National Futures Association # 260707

**Featuring**

**THE EQUILIBRIUM PROGRAM**

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**THE COMMODITY FUTURES TRADING COMMISSION HAS NOT PASSED UPON THE MERITS OF PARTICIPATING IN THIS INVESTMENT PROGRAM NOR HAS THE COMMISSION PASSED ON THE ADEQUACY OR ACCURACY OF THIS DISCLOSURE DOCUMENT.**

No person is authorised by Di Tomasso Group Inc. to give any information or to make any representations that are not contained in this Disclosure Document.

The delivery of this Disclosure Document at any time does not imply that the information contained herein is correct as of any time subsequent to the date shown below.

**THE DATE OF THIS DISCLOSURE DOCUMENT IS September 30, 2011.  
THIS DOCUMENT WILL BE CONSIDERED OUTDATED AFTER June 30, 2012.**

## **RISK DISCLOSURE STATEMENT**

**THE RISK OF LOSS IN TRADING COMMODITY INTERESTS CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. IN CONSIDERING WHETHER TO TRADE OR TO AUTHORIZE SOMEONE ELSE TO TRADE FOR YOU, YOU SHOULD BE AWARE OF THE FOLLOWING:**

**IF YOU PURCHASE A COMMODITY OPTION YOU MAY SUSTAIN A TOTAL LOSS OF THE PREMIUM AND OF ALL TRANSACTION COSTS.**

**IF YOU PURCHASE OR SELL A COMMODITY FUTURES CONTRACT OR SELL A COMMODITY OPTION OR ENGAGE IN OFF-EXCHANGE FOREIGN CURRENCY TRADING YOU MAY SUSTAIN A TOTAL LOSS OF THE INITIAL MARGIN FUNDS OR SECURITY DEPOSIT AND ANY ADDITIONAL FUNDS THAT YOU DEPOSIT WITH YOUR BROKER TO ESTABLISH OR MAINTAIN YOUR POSITION. IF THE MARKET MOVES AGAINST YOUR POSITION, YOU MAY BE CALLED UPON BY YOUR BROKER TO DEPOSIT A SUBSTANTIAL AMOUNT OF ADDITIONAL MARGIN FUNDS, ON SHORT NOTICE, IN ORDER TO MAINTAIN YOUR POSITION. IF YOU DO NOT PROVIDE THE REQUESTED FUNDS WITHIN THE PRESCRIBED TIME, YOUR POSITION MAY BE LIQUIDATED AT A LOSS, AND YOU WILL BE LIABLE FOR ANY RESULTING DEFICIT IN YOUR ACCOUNT.**

**UNDER CERTAIN MARKET CONDITIONS, YOU MAY FIND IT DIFFICULT OR IMPOSSIBLE TO LIQUIDATE A POSITION. THIS CAN OCCUR, FOR EXAMPLE, WHEN THE MARKET MAKES A "LIMIT MOVE."**

**THE PLACEMENT OF CONTINGENT ORDERS BY YOU OR YOUR TRADING ADVISOR, SUCH AS A "STOP-LOSS" OR "STOP-LIMIT" ORDER, WILL NOT NECESSARILY LIMIT YOUR LOSSES TO THE INTENDED AMOUNTS, SINCE MARKET CONDITIONS MAY MAKE IT IMPOSSIBLE TO EXECUTE SUCH ORDERS.**

**A "SPREAD" POSITION MAY NOT BE LESS RISKY THAN A SIMPLE "LONG" OR "SHORT" POSITION.**

**THE HIGH DEGREE OF LEVERAGE THAT IS OFTEN OBTAINABLE IN COMMODITY INTEREST TRADING CAN WORK AGAINST YOU AS WELL AS FOR YOU. THE USE OF LEVERAGE CAN LEAD TO LARGE LOSSES AS WELL AS GAINS. IN SOME CASES, MANAGED COMMODITY ACCOUNTS ARE SUBJECT TO SUBSTANTIAL CHARGES FOR MANAGEMENT AND ADVISORY FEES. IT MAY BE NECESSARY FOR THOSE ACCOUNTS THAT ARE SUBJECT TO THESE CHARGES TO MAKE SUBSTANTIAL TRADING PROFITS TO AVOID DEPLETION OR EXHAUSTION OF THEIR ASSETS. THIS DISCLOSURE DOCUMENT CONTAINS, AT PAGE EIGHT, A COMPLETE DESCRIPTION OF EACH FEE TO BE CHARGED TO YOUR ACCOUNT BY THE COMMODITY TRADING ADVISOR.**

**THIS BRIEF STATEMENT CANNOT DISCLOSE ALL THE RISKS AND OTHER SIGNIFICANT ASPECTS OF THE COMMODITY INTEREST MARKETS. YOU SHOULD THEREFORE CAREFULLY STUDY THIS DISCLOSURE DOCUMENT AND COMMODITY INTEREST TRADING BEFORE YOU TRADE, INCLUDING THE DESCRIPTION OF THE PRINCIPAL RISK FACTORS OF THIS INVESTMENT, AT PAGE 13 TO 16.**

**YOU SHOULD ALSO BE AWARE THAT THIS COMMODITY TRADING ADVISOR MAY ENGAGE IN TRADING FOREIGN FUTURES OR OPTIONS CONTRACTS. TRANSACTIONS ON MARKETS LOCATED OUTSIDE THE UNITED STATES, INCLUDING MARKETS FORMALLY LINKED TO A UNITED STATES MARKET MAY BE SUBJECT TO REGULATIONS WHICH OFFER DIFFERENT OR DIMINISHED PROTECTION. FURTHER, UNITED STATES REGULATORY AUTHORITIES MAY BE UNABLE TO COMPEL THE ENFORCEMENT OF THE RULES OF REGULATORY AUTHORITIES OR MARKETS IN NON-UNITED STATES JURISDICTIONS WHERE YOUR TRANSACTIONS MAY BE EFFECTED. BEFORE YOU TRADE YOU SHOULD INQUIRE ABOUT ANY RULES RELEVANT TO YOUR PARTICULAR CONTEMPLATED TRANSACTIONS AND ASK THE FIRM WITH WHICH YOU INTEND TO TRADE FOR DETAILS ABOUT THE TYPES OF REDRESS AVAILABLE IN BOTH YOUR**

**LOCAL AND OTHER RELEVANT JURISDICTIONS.**

**THIS COMMODITY TRADING ADVISOR IS PROHIBITED BY LAW FROM ACCEPTING FUNDS IN THE TRADING ADVISOR'S NAME FROM A CLIENT FOR TRADING COMMODITY INTERESTS. YOU MUST PLACE ALL FUNDS FOR TRADING IN THIS TRADING PROGRAM DIRECTLY WITH A FUTURES COMMISSION MERCHANT OR RETAIL FOREIGN EXCHANGE DEALER, AS APPLICABLE.**

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## THE TRADING ADVISOR

John Di Tomasso originally became registered as a commodity trading advisor (“CTA”) and commodity pool operator (“CPO”) with the Commodity Futures Trading Commission (“CFTC”) and a member of the National Futures Association on February 9, 1995. Mr. Di Tomasso’s registrations were transferred to Di Tomasso Group Inc., an Ontario, Canada corporation, on May 24, 1996, and further transferred to Di Tomasso Group Inc., a British Columbia, Canada corporation, on November 3, 1997. The firm withdrew as an NFA member and as a commodity pool operator and commodity trading advisor in May, 2002. The firm was registered as a CTA on February 3, 2009 and was approved as an NFA member on February 27, 2009. There has never been any administrative, civil or criminal proceeding against Di Tomasso Group or its principals.

Di Tomasso Group Inc. [hereinafter also known as the “Di Tomasso Group”, or “Advisor”], was founded under the laws of the Province of Ontario in November, 1994 and continued under the laws of the Province of British Columbia in November 1997. References herein to Di Tomasso Group refer to Mr. Di Tomasso’s registered sole proprietorship prior to May 24, 1996 and to the Ontario corporation on and after May 24, 1996, and to the B.C. corporation on and after November 3, 1997. Di Tomasso Group’s principal place of business is located at 956 Shadywood Drive, Victoria, B.C, Canada, V8X 4C3; telephone: (250) 744-1650.

All business records will be kept and made available, during normal business hours, for inspection at Di Tomasso Group’s principal place of business.

Since its inception in November 1994, Di Tomasso Group has offered professional portfolio management and advisory services to pooled commodity funds and individual investors. During the period between May, 2002 and February, 2009, when the firm was not registered with the CFTC or NFA, the firm offered its services to Canadian clients only.

Di Tomasso Group’s past performance information is available on page 10.

**John Di Tomasso**, President, has been managing and advising commodity pools and accounts since 1991. John directed the trading of the The Equilibrium Fund (which operated during the period May, 1991 {inception} to November 1994 under the name of Burgundy Managed Futures Fund) pursuant to the Di Tomasso Equilibrium Program. In August, 1990, Mr. Di Tomasso co-founded Burgundy Asset Management Limited and took on responsibility for managing all Burgundy’s Funds. Burgundy Asset Management is an investment counselling firm offering the management of commodity pools and stock and bond portfolios. In November, 1994, John left Burgundy Asset Management and formed Di Tomasso Group Inc. at which time the Burgundy Managed Futures Fund was transferred to Di Tomasso Group and the name changed to The Equilibrium Fund and he continues to manage that Fund as well as other accounts managed pursuant to the Equilibrium Program.

John was approved as a principal of the firm in February, 1995 and he became registered as an associated person of the firm and a member of the NFA in May, 1996. In May, 2002, John withdrew as a member of the NFA including his status as a principal, associate member and associated person of the firm. On August 28, 2008 John was approved as a principal of the firm. On February 19, 2009 John was registered as an associated person. Between May, 2002 and August, 2008, John remained registered as a Portfolio Manager in the Province of British Columbia and managed commodity pools for Canadian clients.

John Di Tomasso received a Bachelor of Arts degree from the University of Guelph in 1970. During 1991 to 1996 John lectured at York University on the subject of Value Investing. He is a member of the National Futures Association, a past member of the University of Victoria Pension Fund Investment Committee, the Victoria Society of Financial Analysts, the Association for Investment Management and Research (AIMR) and the Managed Funds Association. John is a past President of the Victoria Gyro Club. He is married to Karen and they have four fine children.

**Brian Di Tomasso** is the firm’s Vice President, Investments and IT Manager. Brian joined Di Tomasso Group full-time in August, 2005 having worked part-time with the firm since 2000 while

becoming a Computer Systems Technology specialist at Camosun College and the University of Victoria. Brian is responsible for trade execution, financial reporting, and research while developing proprietary software used to enhance investment decision making.

**Karen Di Tomasso**, also a graduate of the University of Guelph, is Controller of Di Tomasso Group, having joined the firm in June, 1995 following a distinguished career in community volunteer work, including serving for many years as a member of the Board of Management of the Canadian Red Cross. Karen earned a Bachelor of Arts degree in psychology from the University of Guelph. She completed computer and accounting courses at Sheridan College in Oakville, Ontario.

**Monica Chitty** is an administrator with duties covering most aspects of office management.

**DTG Holdings Inc.** is deemed to be a Non-natural Person Principal of Di Tomasso Group Inc. under National Futures Association Rule 208 since it holds a 10% or more interest in Di Tomasso Group. DTG Holdings Inc., wholly owned by John Di Tomasso, was created for estate planning purposes.

## THE EQUILIBRIUM PROGRAM

Our firm's value approach is an investment program, not just a trading program. It is characterized by a long term, buy and hold, low turn-over, reversion-to-the-mean style that sets it apart. The following description is of necessity general and is not intended to be exhaustive.

The **Equilibrium Program** invests in publicly listed commodity futures contracts and options contracts that are restricted to physical commodities such as grains, meats, metals, energy products and "softs". The Program normally commits approximately a quarter of its assets to active commodity investments and places the balance in government treasury bills. The proportion of assets committed as such may vary from the above guideline and, in any case, the advisor will have full discretion as to its determination.

### Investment Approach

Our Equilibrium Program is characterized by three key features:

- (1) Fundamental research – We scour the world for supply and demand information pertinent to our commodity candidates. Investments are made when the supply/demand balance favours taking a particular position, either long or short.
- (2) Using selected data covering the past 50 year period, we calculate the current intrinsic value of each major tradable commodity identifying those commodities which are the most under-valued or over-valued. It is presumed that the price of each commodity will eventually revert to its historic mean.
- (3) The implementation of a **sound trading strategy** which enables our central models to translate the mispricing of these commodities into profits by:
  - (i) utilising *proprietary option valuation models* to determine which option strike price and which option expiry month best satisfies its stringent risk-reward requirements;
  - (ii) *disciplined execution* which minimizes option premium decay and slippage; and, of **paramount importance...**
  - (iii) *the imposition of a rigorous risk control and management program* which ensures that downside risk is reasonably modest at all times – our ongoing re-balancing process is designed to keep an account's Value at Risk and degree of leverage relatively constant even in volatile markets.

### Changes to Trading Methodology:

In late 2001, as a result of the Asian economic crisis, commodity prices crashed and the performance of our predominantly long positions, suffered a major drawdown. In retrospect we were too

aggressive. Lesson learned. We have addressed our Value at Risk profile by significantly reducing the use of leverage.

## **How are we Different?**

When contrasting the Equilibrium Program's non-traditional investment approach against the short-term, trend following strategies of many other managed futures funds, consider the following:

- (i) the Program will establish commodity positions and patiently maintain those positions through contract roll-overs until price objectives are achieved – conceivably, a position might be held for several years;
- (ii) Our highly disciplined, quantitative approach is largely independent of public opinion, media commentary or macro-economic forecasts of anticipated commodity price movements. We believe that such forecasts are generally unreliable;
- (iii) We believe that our proprietary option valuation models will generate returns which supplement and are largely independent of the returns expected from our primarily long term “value” approach; and
- (iv) traditional managed futures funds' short-term focus often results in frequent trading, with attendant transaction and execution slippage. Our approach generally results in lower brokerage costs and reduced execution slippage. For example, the Program might trade approximately 1000 round turns per \$1,000,000 equity per year. Based on past results, annual brokerage commissions are expected to comprise less than 1% of equity.

## **Risk Management Program**

Risk is commonly defined as the likelihood of permanent loss of invested capital, not as a measure of volatility. Modern Portfolio Theory has popularized the notion that risk can be measured in terms of price fluctuations - by that standard, a commodity that suffers a price decline to a historically low level would be considered "highly risky". We view such logic as inherently flawed. Rather, whenever a commodity trades close to its extreme historical price, we see that as an investment opportunity rather than a risk. The risk, in our view, is that a commodity position, once taken, might remain "offside" for an extended period.

Our style incorporates a risk management program designed to reduce the risk of loss of invested capital. Measures taken as part of this program include, but are not limited to:

- (i) the allocation and maintenance of sufficient cash reserves to meet any anticipated margin calls, even below a level that, by historical measures, would be called a “worst case scenario”;
- (ii) diversification of the Program's positions among several commodities with representation from various commodity groups;
- (iii) purchase, where appropriate, option contracts to replace existing futures or forward contract positions or in lieu of the purchase of futures or forward contracts;
- (iv) a policy of not engaging in pyramiding its commodities positions (i.e. the use of unrealised profits on existing positions to provide margin for the acquisition of additional positions in the same or a related commodity); and
- (v) our rebalancing process is designed to limit the over-all risk exposure of an account. “Over-all risk exposure” means the sum of: (i) the total potential loss incurred in the event that the underlying value of account's forward and futures contract positions fall to their inflation-adjusted historic lows; (ii) the total loss of value of all option contract positions held, and (iii) all those losses occurring simultaneously.

## **Markets Traded**

We invest using primarily futures/forwards and options contracts. We generally restrict investments to tangible commodities such as grains, meats, metals, energies and soft commodities such as coffee, cocoa and sugar. We restrict our trading to United States, United Kingdom and Japanese commodity exchanges. It is possible, however, that we may trade in other markets deemed to be appropriate for the Program. We do not anticipate ever participating in non-exchange transactions.

## **Account Size**

The minimum account size that Di Tomasso Group will accept is \$5,000,000. The firm does not accept notionally funded accounts.

## **Account Acceptance and Suitability**

Accounts are subject to rejection or acceptance, in whole or in part, by the Manager. Confirmation of the acceptance of a subscription will be forwarded by the Manager to the investor. The Manager is not obligated to accept any account, and will reject any account which the Manager considers not to be in compliance with applicable securities laws and regulations. The Manager is required to assess the client's suitability of an investment in the program. The Manager shall reject the account if it is deemed unsuitable.

## **Fees and Expenses**

Management Fee - A quarterly management fee equal to 1/2 of 1% (2% annually), plus any applicable federal, state and/or provincial taxes, of the net asset value of an account is due and payable as of the last business day of each calendar quarter. Management fees are due and payable to Di Tomasso Group regardless of the client account's profitability.

Net Asset Value of an account is the total assets minus total liabilities, determined in accordance with generally accepted accounting principles, with each position in a commodity interest accounted for at fair market value.

Performance Fee - A performance fee equal to 20% of the account's calendar quarterly Net New Appreciation, plus any applicable federal, state and/or provincial taxes, if any, is due and payable as of the last business day of each quarter. Net New Appreciation is equal to the sum of gain/(loss) realized from closure of trade positions during the period minus commissions and fees charged on those transactions, plus the change in unrealised profit/(loss), minus the change in accrued commissions, minus management fees, plus any interest earned, and plus cumulative net realized losses, if any, carried forward from preceding periods.

No performance fees shall be payable to Di Tomasso Group until future Appreciation for the ensuing periods exceed any carry-forward loss. With regard to the carry-forward loss, if funds are withdrawn during a period by reason of decreasing or withdrawal of Management Fee Net Asset Value when there is such carry-forward loss, the loss shall be reduced, at the time of withdrawal, by the percentage obtained by dividing the amount of the withdrawal by the account's Management Net Asset Value immediately before the withdrawal.

Other Expenses - The account is responsible for the payment of all fees and expenses relating to its operation including (if applicable): legal fees and expenses; custody and safekeeping charges; all taxes, assessments or other governmental charges levied against the account; and interest and all brokerage and other fees relating to the purchase and sale of the assets of the account. The Manager will pay for all expenses associated with the identification and management of the account's investments (other than direct expenses such as brokerage fees, which are the responsibility of the account).

## **Fee Payment Authorization**

Each client will be required to sign a Fee Payment Authorization that will authorize the client's account to remit directly to Di Tomasso Group, payment of the management and performance fees. Shortly after the end of each quarter, Di Tomasso Group will prepare an invoice setting forth the amount of quarterly management fee and quarterly performance fee, if any, payable to Di Tomasso

Group. A copy of this invoice will be sent to the client and the clearing broker. Upon submission of the invoice to the client's clearing broker, the clearing broker and Di Tomasso Group are authorized by the client to deduct these fees directly from the client's Account.

## **Shared Fees**

Recognized selling agents ("Agents") may be compensated by Di Tomasso Group for introducing Prospective Investors to the Equilibrium Program. Any compensation paid to Agents will not be charged to the Investor, but rather will be paid by Di Tomasso Group. As compensation, Agents will receive a proportion of Management and Performance Fees earned by Di Tomasso Group as the investment manager. Investors utilizing the services of an Agent must confirm the arrangement by executing a portion of the Management Agreement relating to Selling Agent Compensation.

## **Futures Commission Merchants**

Di Tomasso Group has no relationship, affiliation, conflict of interest or business arrangement with any IB, FCM, bank or financial institution or principal thereof, whereby our firm may benefit, directly or indirectly, from the maintenance of a client's Commodity Contract account with that organization.

A managed account client must select the futures commission merchant at which to maintain its account, and may also select an introducing broker through which its account will be handled (note: a client may choose an IB in addition to an FCM, but may not choose an IB in lieu of an FCM). The Firm reserves the right to disapprove any FCM or IB chosen by the client. Generally, such disapproval will be based on the past performance, execution capabilities, product limitations and commission structure of the FCM or IB. The client's account will be charged a commission for each trade cleared by the FCM. The use of an IB may increase commission charges.

The Advisor may direct trades to FCMs or independent floor brokers it chooses for execution with instructions to "give up" such trades to the client's clearing broker. In such instances, the client's account will be charged a give-up fee for each trade on U.S. and foreign exchanges, particularly the London Metal Exchange. Clients may be required to sign documentation which specifically authorizes the Advisor to execute orders utilizing a give-up procedure and to enter into give-up agreements with the executing and clearing brokers involved, and authorizing The Firm to act on behalf of the client in negotiating those agreements. The Advisory Agreement requires the client to pay all charges associated with such trades, typically \$0.50 to \$1.00 per contract. Such payments will be paid directly from the account.

## **Fair Allocation Policy**

The Advisor may manage multiple client accounts that require executing an identical transaction. The Advisor may place orders for multiple accounts within a block (or "bunched") order that will include client but not proprietary accounts of the Advisor. A block trade is a purchase or sale order of a large quantity of commodity contracts and the resulting trade is broken up and allocated across multiple accounts. No assurance can be given that it will be possible to execute trades regularly at or near the desired buy or sell point or that orders will be executed successfully. In all instances, the Advisor will employ the following price allocation system that promotes fairness among all client accounts.

Bunched trades that are completely filled, but at differing prices, shall be allocated on the following basis:

- All customer account numbers will be provided to the firm's clearing brokers contemporaneously with the placing of buy/sell orders of Commodity Contracts.
- Commodity Contracts traded pursuant to a bunched trade which are filled at different prices will be allocated to the applicable accounts on a "higher account number, higher price" basis for both purchases and sales.

Bunched trades that are partially filled will be allocated on the following basis:

- Contracts will be allocated to the applicable accounts on a pro rata basis, unless the total number of contracts actually purchased/sold is immaterial relative to the number of contracts comprising the block order, in which case the account(s) requiring the fewest contracts under the block order will be given priority.

Bunched trades that are partially filled at differing prices will be allocated on the following basis:

- Contracts will be allocated on a pro rata basis as outlined in the preceding section and on the “higher account number, higher price” basis for both purchases and sales.

## **Past Performance of Di Tomasso Group**

The Equilibrium Program Composite Performance results are the combined results of three funds managed by Di Tomasso Group, including: ***The Equilibrium Fund*** since May, 1991; ***a Commodity Fund of a major Canadian Bank*** since February, 2006 and; ***a separately managed account for an individual*** since January 2010. The Custom Program #1 is a separately managed account whose mandate falls outside of the Equilibrium Program. Performance is computed on an accrual basis of accounting according to Generally Accepted Accounting Principles. Results are in the currency specified at the top of each capsule. These Funds are not open to U.S. investors.

**PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. NO REPRESENTATION IS BEING MADE THAT AN ACCOUNT WILL OR IS LIKELY TO ACHIEVE RESULTS SIMILAR TO THOSE SHOWN IN THE CAPSULE PERFORMANCE TABLES.**

**CAPSULE A**  
**THE DI TOMASSO GROUP**  
**CAPSULE PERFORMANCE OF THE EQUILIBRIUM PROGRAM**  
**IN CANADIAN FUNDS**  
**AS OF SEPTEMBER 30, 2011**

Name of CTA:	Di Tomasso Group Inc.
Trading Program:	The Equilibrium Program
Inception of Trading by CTA:	May, 1991
Inception of Trading pursuant to The Equilibrium Program**:	May, 1991
Number of Accounts using Equilibrium Program:	3 *
Total Assets under Management by CTA:	\$92.85 million (\$89.10m USD)
Total Assets in the Equilibrium Program:	\$89.83 million (\$86.20m USD)
Largest Monthly Draw-down (since 1/1/2006) ***:	-13.04% in April, 2007
Largest Peak-to-Valley Draw-down (since 1/1/2006) ****:	-21.80% January, 2011 to July, 2011
Closed Accounts, Positive Net Performance (since 1/1/06):	none
Closed Accounts, Negative Net Performance (since 1/1/06):	none

<b>RATES OF RETURN *****</b>
<b>PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS</b>

	<b>2011</b>	<b>2010</b>	<b>2009</b>	<b>2008</b>	<b>2007</b>	<b>2006</b>
January	4.32%	0.75%	-2.81%	7.42%	5.80%	1.56%
February	-12.30%	0.86%	-7.51%	6.30%	3.83%	1.47%
March	-2.10%	-2.42%	5.13%	-12.72%	-3.14%	-0.55%
April	-4.13%	1.73%	5.00%	2.81%	-13.04%	1.54%
May	3.33%	2.12%	8.24%	-3.20%	4.16%	1.60%
June	-1.98%	6.47%	-1.06%	7.43%	8.92%	2.03%
July	-6.21%	2.18%	6.11%	1.48%	1.99%	-3.00%
August	0.03%	2.02%	-3.82%	1.55%	0.19%	0.30%
September	31.72%	4.03%	5.62%	-1.92%	4.92%	2.31%
October		0.39%	8.91%	13.39%	-6.66%	11.76%
November		0.42%	4.35%	2.16%	7.64%	6.73%
December		-3.46%	-0.11%	-1.41%	8.53%	1.33%
<b>Annual Rate</b>	<b>7.49%</b>	<b>15.75%</b>	<b>30.01%</b>	<b>22.99%</b>	<b>22.70%</b>	<b>29.79%</b>

\* The three accounts begun in 1991, 2006 and 2010 remain open.

\*\* The Equilibrium Program commenced trading in May 1991. The Equilibrium Program was revised in January 2002 as disclosed in the *Changes to Trading Methodology* on page 6.

\*\*\* "Largest monthly draw-down" is the largest monthly trading loss experienced by the Trading Program on a composite basis in any calendar month covered by the capsule, expressed as a percentage of total equity.

\*\*\*\* "Largest peak-to-valley draw-down" is the largest cumulative percentage trading loss of the Trading Program account during the period covered by the capsule from any month-end net asset value, without such month-end net asset value being equaled or exceeded as of a subsequent month-end by the Trading Program, expressed as a percentage of total equity.

\*\*\*\*\* The Monthly Rate of Return is computed by dividing the net income by the beginning nominal equity. Additions or withdrawals made other than at the beginning or end of a month are excluded from that month's computation.

**CAPSULE B**  
**THE DI TOMASSO GROUP**  
**CAPSULE PERFORMANCE OF THE CUSTOM PROGRAM #1**  
**IN CANADIAN FUNDS**  
**AS OF SEPTEMBER 30, 2011**

Name of CTA:	Di Tomasso Group Inc.
Trading Program:	The Custom Program #1
Inception of Trading by CTA:	May, 1991
Inception of Trading pursuant to The Custom Program #1:	January, 2006
Number of Accounts using The Custom Program #1:	1
Total Assets under Management by CTA:	\$92.85 million (\$89.10m USD)
Total Assets in the Custom Program #1:	\$3.02 million (\$2.90m USD)
Largest Monthly Draw-down (since 1/1/2006) **::	29.35% in October, 2008
Largest Peak-to-Valley Draw-down (since 1/1/2006) ***:	65.98% Feb. 2008 to Feb. 2009
Closed Accounts, Positive Net Performance (since 1/1/06):	none
Closed Accounts, Negative Net Performance (since 1/1/06):	none

**RATES OF RETURN \*\*\*\***

**PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS**

	<b>2011</b>	<b>2010</b>	<b>2009</b>	<b>2008</b>	<b>2007</b>	<b>2006</b>
January	3.97%	-8.80%	-1.76%	57.74%	10.55%	5.03%
February	-17.29%	13.91%	-18.01%	33.47%	17.69%	-0.58%
March	-8.28%	7.74%	4.91%	-15.06%	-1.28%	3.08%
April	-9.60%	16.34%	14.02%	-2.59%	-27.49%	0.93%
May	24.16%	-8.53%	10.10%	-15.73%	12.20%	1.02%
June	-1.33%	-2.78%	-1.11%	27.65%	31.83%	-2.14%
July	-13.17%	4.31%	17.34%	0.64%	6.30%	-5.61%
August	2.71%	12.38%	1.48%	-8.84%	-11.95%	-6.96%
September	62.23%	9.37%	2.66%	-19.74%	13.13%	-4.43%
October		-9.11%	21.21%	-29.35%	-9.79%	42.90%
November		2.87%	5.23%	-12.73%	-3.29%	6.26%
December		-1.48%	7.41%	4.51%	42.18%	3.60%
<b>Annual Rate</b>	<b>26.39%</b>	<b>36.73%</b>	<b>75.69%</b>	<b>-11.09%</b>	<b>80.91%</b>	<b>41.81%</b>

\* The Custom Program #1 is a separately managed account whose mandate falls outside of the Equilibrium Program

\*\* "Largest monthly draw-down" is the largest monthly trading loss experienced by the Trading Program on a composite basis in any calendar month covered by the capsule, expressed as a percentage of total equity.

\*\*\* "Largest peak-to-valley draw-down" is the largest cumulative percentage trading loss of the Trading Program account during the period covered by the capsule from any month-end net asset value, without such month-end net asset value being equaled or exceeded as of a subsequent month-end by the Trading Program, expressed as a percentage of total equity.

\*\*\*\* The Monthly Rate of Return is computed by dividing the net income by the beginning nominal equity. Additions or withdrawals made other than at the beginning or end of a month are excluded from that month's computation.

## Principal Risk Factors

AN INVESTMENT IN COMMODITIES IS SPECULATIVE AND INVOLVES A HIGH DEGREE OF RISK. A client's liability in trading an individually managed account is not limited. A client therefore must be able to bear the loss of more than its entire investment. Prospective clients should consider all of the risk factors described below and elsewhere in the Disclosure Document before allocating funds to the Advisor for management.

THE USE OF BORROWED MONEY. A client's use of borrowed money to finance the purchase of securities involves greater risk than a purchase using cash resources only. If you borrow money to purchase securities, your responsibility to repay the loan and pay interest as required by its terms remains the same even if the value of the securities purchased declines.

FAILURE OF FUTURES COMMISSION MERCHANT ("FCM"). Under the Equilibrium Program (the "Program"), a client's funds may be held by institutions (FCMs) located in the United States of America. Under CFTC regulations, a client's FCM is required to maintain the client's assets in a segregated account. If the FCM fails to do so, the client may be subject to the risk of loss of funds on deposit with the FCM in the event of bankruptcy. In addition, under certain circumstances, such as one of the FCM's customers failing to satisfy a margin call, the client may be subject to the risk of loss of his funds on deposit with the FCM, even if such funds are properly segregated. In the case of any such bankruptcy or customer loss, the client may recover, even in respect of property specifically traceable to the client's account, only a pro rata share of all property available to all of the FCM's customers.

COUNTERPARTY CREDIT RISK. Under CFTC regulations, FCMs are, with limited exceptions, required to maintain clients' assets in a segregated account. If a client's FCM fails to do so, the client may be subject to a risk of loss of its funds on deposit with its FCM in the event of the FCM's bankruptcy. In addition, under certain circumstances, such as the inability of another customer of the FCM or the FCM itself to satisfy substantial deficiencies in such other customer's account, a client maybe subject to a risk of loss of its funds on deposit with its FCM, even if such funds are properly segregated . In the case of any such bankruptcy or client loss, a client might recover, even in respect of property specifically traceable to the client, only a pro rata share of all property available for distribution to all of the FCM's clients. Similarly, the FCM will not be liable to the client for the loss, or loss of use, of monies that is the direct or indirect result of bankruptcy, insolvency, liquidation, receivership, custodianship or assignment for the benefit of creditors of any bank, other clearing broker, exchange, clearing organization or similar entity.

Commodity exchanges provide centralized market facilities for trading in futures contracts relating to specified commodities. Each of the commodity exchanges in the United States has an associated "clearinghouse." Once trades made between members of an exchange have been confirmed, the clearinghouse becomes substituted for the clearing member acting on behalf of each buyer and seller of contracts traded on the exchange and in effect becomes the other party to trade. Thereafter, each clearing member firm party to the trade looks only to the clearinghouse for performance. Clearinghouses do not deal with customers, but only with member firms, and the "guarantee" of performance under open positions provided by the clearinghouse does not run to customers. If a customer's commodity broker becomes insolvent, or otherwise defaults on such broker's obligations to such customers, the customer in question may not receive all amounts owing to such customer in respect of his or her trading, despite the clearinghouse fully discharging all of its obligations. In addition, some foreign exchanges, in contrast to United States exchanges, are "principals' markets" in which performance is the responsibility only of the individual members with whom the trader has entered into a futures contract and not of an exchange or clearing organization. A client will be subject to the risk of the inability or refusal to perform on the part of the principals with whom such contracts are traded.

We will seldom, if ever, trade in over-the-counter commodity futures and forward markets. These markets do not have the safeguard mechanisms of a clearing organisation which, in effect, guarantee every exchange-traded instrument. In contrast to exchange-traded futures contracts, over-the-counter instruments rely on the dealer or counterparty being contracted with to fulfil its contract.

Failure by a counterparty to fulfil its contractual obligations could expose the client to unanticipated losses.

**SPECULATION: VOLATILITY AND LEVERAGE.** Trading in commodity futures contracts has traditionally been viewed as a highly speculative venture and one suitable only for investors who have been able to risk the loss of their entire investment. The price of commodities can make substantial moves in short periods of time. Prices are influenced by, among other things, changing supply and demand relationships, government reports, agricultural and trade programs and national and international economic and political events. The supply of agricultural commodities can be instantly altered by unexpected weather events or outbreaks of plant diseases or insect attacks. Substantial profits and losses in commodity trading are a factor of extremely high leverage that is available in the futures markets. As a result, just a relatively small price move can dramatically impact a margin account. As an example, if the initial margin deposit for a corn contract is 3% of the face value of the underlying corn, then an adverse price move of 4% would result in a total loss in excess of the margin deposit. Therefore, the maintenance of large reserve funds is important in commodity trading to help absorb potential short-term trading losses so as to not effect the longer term investment growth of the account. *Our firm will undertake no transaction or strategy wherein the transaction is obliged to accept unlimited liability* (eg. unhedged shorting of futures contracts).

**MARGIN.** A margin deposit is similar to a cash performance bond. It helps assure the trader's performance of the futures contract. If the market value of a particular futures position moves to such a degree that the initial margin deposit is not sufficient to satisfy minimum maintenance requirements, the broker will make a call for additional margin money. The margin call must be satisfied within a reasonable period of time or the broker is required to liquidate the open position. In periods of high volatility, brokerage firms may elect to increase the amount of margin they require to carry futures positions for their customers.

**PRICE LIMITS AND LIQUIDITY.** Most commodity exchanges limit fluctuations in commodity futures contracts during a single day. The daily price limits dictate the maximum amount the price of a futures contract may vary from the previous day's closing price. Once that daily limit has been reached, no trades may be made at a price beyond the limit. Positions in the commodity can then be taken or liquidated only if traders are willing to trade at prices within that day's limit. Because the daily "limit" rule only deals with price movement for a particular trading day, it affords protection only against losses which may occur during that trading day. Such daily price limits do not protect the trader for the longer term as it is possible for prices to move the daily limit for several consecutive days with little or no trading taking place, thus preventing, perhaps, a trader with a losing position from liquidating that position and subjecting that trader to substantial losses.

Another instance of difficult or impossible execution occurs in thinly traded markets or markets which lack sufficient trading liquidity. The liquidity in markets changes over time and may impact our selection of commodities. Although we intend to purchase and sell liquid commodities, no assurance can be given that its orders will be executed at or near the desired price. Further, even if futures and options prices have not moved the daily limit, the advisor may be unable to execute trades at favourable prices if the volume of trading in the relevant contracts is not adequate. We might not be able to purchase or sell options on futures contracts on an intra-day basis at a desired strike price if price movements have brought the futures price outside the range of listed strike prices. It is also possible for an exchange or the CFTC to suspend trading in a particular contract, order immediate settlement of a particular contract or that trading in a particular contract be conducted for liquidation only.

**TRADING OF FOREIGN FUTURES MARKETS.** Di Tomasso Group will primarily conduct trading activities in futures contracts and options on exchanges in the United States. However, we are not restricted to trading only on domestic exchanges and expects to trade foreign futures and forward contracts. This could expose the investment to risks which are different in nature and/or in degree from the risks inherent in domestic trading. Foreign trading is frequently less regulated and can involve the risk of default by the opposing party. Foreign trading can lack the financial security and benefits of the daily "market-to-market" system afforded by the clearinghouse system of the CFTC-regulated futures exchanges, and such trading can lack the liquidity afforded by those exchanges. Furthermore, trading on foreign exchanges may also be more vulnerable to a variety of political influences and the possibility of direct government intervention. Futures contracts on foreign

exchanges might not be considered to be “regulated futures contracts” for federal income tax purposes.

**OPTIONS.** Di Tomasso Group trades options on futures and forward contracts. A significant portion of investments in underlying interests will be through the purchase of options on futures. Each such option is a right, purchased for a certain price, to either buy or sell a futures or forward contract during a certain period of time for a pre-established price. Although successful option trading probably requires many of the same skills required for successful futures or forward trading, the risks involved may be somewhat different. Specific market movements of the commodities or futures contracts underlying an option cannot accurately be predicted. The purchaser of an option is subject to the risk of losing the entire purchase price of the option. The writer of an option is subject to the risk of loss resulting from the difference between the premium received for the option and the price of the futures or forward contract underlying the option, which the writer must purchase or deliver upon exercise of the option. Options trading on United States exchanges are subject to regulation by both the CFTC and such exchanges.

**EFFECTS OF SPECULATIVE POSITION LIMITS.** The CFTC and the United States futures exchanges have established limits, referred to as “speculative position limits,” on the maximum net long or short speculative positions that a person may hold or control in certain futures or options contracts traded on United States commodities exchanges. All accounts owned or managed by our firm will be combined for position limit purposes. Di Tomasso Group could be required to liquidate positions held for a client in order to comply with such limits. Any such liquidation could result in substantial losses to a client.

**SUBSTANTIAL FEES AND EXPENSES.** A client may be subject to substantial brokerage commissions (including “give-up” fees), management fees and, possibly, performance fees. Accordingly, a client’s account will have to earn substantial trading profits to avoid depletion of assets due to such commissions and fees.

**RELIANCE ON THE PRINCIPALS.** There can be no assurance that the trading strategies utilized by our firm will be profitable. Our firm depends on the services of its trading principals. If such services were not available to the firm, the continued ability of the firm to render services to clients might be subject to substantial uncertainty, and the services of the firm could be terminated completely. Di Tomasso Group may alter its trading tactics and/or strategies (though not its material fundamental approach) when it determines that a change is in the best interests of its clients, and may do so without prior approval by, or notice to, its clients.

**CONCENTRATION OF INVESTMENTS.** There is no limit on the amount of assets that Di Tomasso Group may invest in any particular position or strategy. Accordingly, a loss in any single position or strategy could materially reduce the value of a client’s account.

**EXTERNAL CONDITIONS.** The value of a client’s positions may be subject to decreases as a result of general economic conditions. Furthermore, new legislation, unforeseen events or changes in governmental regulations could adversely affect Di Tomasso Group’s ability to engage in certain of its anticipated investments.

**DRAW-DOWNS.** Historically, approximately 69% of all monthly performance results made pursuant to the Firm’s investment programs have been profitable. The greatest cumulative percentage decline in net asset value that the Firm has experienced since 2004 in any single investment program on a composite basis was 25.3 percent. You should understand that similar or greater draw-downs are possible in the future. Draw-downs on a per program basis are presented in the Capsule Performance beginning on page 9.

**DEFAULT AND COUNTERPARTY RISK.** Some of the markets in which the Advisor may effect transactions for client accounts are “over-the-counter” or “interdealer” markets. The participants in such markets are typically not subject to credit evaluation and regulatory oversight as are members of “exchange based” markets. This exposes the client to the risk that a counterparty will not settle a transaction in accordance with its terms and conditions because of a dispute over the terms of the contract (whether or not bona fide) or because of a credit or liquidity problem, thus causing a client to suffer a loss. In addition, in the case of a default, the client could become subject to adverse

market movements while replacement transactions are executed. Such “counterparty risk” is accentuated for contracts with longer maturities where events may intervene to prevent settlement, or where the Advisor has concentrated its transactions with a single or small group of counterparties. The Advisor may not have an internal credit function which evaluates the creditworthiness of its counterparties. The ability of the Advisor to transact business with any one or number of counterparties, the lack of any meaningful and independent evaluation of such counterparties’ financial capabilities and the absence of a regulated market to facilitate settlement may increase the potential for losses by a client.

**MANAGEMENT OF THE FIRM’S OTHER ACCOUNTS.** The Advisor engages in other investment activities as a commodity pool operator and commodity trading advisor. Such activities may include, without limitation, management of the accounts of numerous clients, as well as the management of a number of private investment funds. As a result of these activities, the Advisor may have incentives to favor certain accounts. In addition, all of the positions held by all accounts directed by the Advisor will be aggregated for purposes of determining compliance with speculative position limits. If open positions must be reduced as a result of the application of speculative position limits, the Advisor will take such action, consistent with its obligation not to favor any account advised by it over another client’s account, as may be necessary to comply with such limits.

**POSSIBLE ADVERSE EFFECTS OF INCREASING THE ASSETS MANAGED BY THE ADVISOR.** Firms may be limited in the amount of assets that they can successfully manage by both the difficulty of executing substantially larger trades in order to reflect larger equity under management and by the restrictive effects of position limits and possible market illiquidity. The Advisor has not agreed to limit its assets under management, even if doing so might be in the best interests of a particular client. There can be no assurance that the Di Tomasso Group’s strategies will not be adversely affected by additional equity accepted by the Advisor.

**CHANGES IN TRADING APPROACH AND COMMODITY INTERESTS TRADED.** The Advisor may alter its approach in the event that it determines that such change is in the best interests of a client. The Advisor will notify the client of any changes in the trading approach that it uses for the client which it considers to be material. However, the client will not be notified of changes in the particular futures, options, or other contracts traded, or of other modifications, additions or deletions to its trading approach that the Advisor does not consider to be material.

**INSTITUTIONAL RISK.** Institutions, such as banks and cash managers, will have custody of the Advisor’s assets. Bankruptcy or fraud at one of these institutions could impair the operational capabilities or the capital position of the Advisor and could cause losses to the client.

**CONFLICTS OF INTEREST.** The Advisor is subject to actual or potential conflicts of interest. See “Actual or Potential Conflicts of Interest” on page 16.

**STATUTORY REGULATION.** Although Di Tomasso Group will be subject to the rules of various regulatory agencies, the firm will not be registered under the Investment Advisors Act of 1940, as amended. Protective measures provided by such legislation will not be afforded to clients.

**TAX MATTERS.** Each account holder should consult his or her tax advisor as to the tax consequences of a commodity investment.

**The foregoing list of principal risk factors does not purport to be a complete explanation of the risks involved with Di Tomasso Group’s Equilibrium Program. Potential clients should read this entire Disclosure Document and the risk disclosure statements of the relevant FCM or IB with particular care and give due consideration to the risks described therein. In addition, each client is urged to consult with the prospective client’s own financial advisors and attempt to familiarize themselves with the futures and forwards markets before reaching an investment decision.**

## **Actual or Potential Conflicts of Interest**

Clients should consider, among others, the following potential conflicts of interest:

- (1) Di Tomasso Group may trade for the accounts of other clients, including commodity pools with substantial amounts of assets. Such accounts may have fee structures or other features which may be more beneficial to our firm than those accounts accepted under the guidelines described herein, and therefore may involve a conflict of interest with regard to our duty not to favour one account over any other.
- (2) Our firm does not trade for its own account but it may do so in future. Because of different financial circumstances and/or objectives, this may involve a potential conflict of interest in that such trades may be different from, but will not be opposite to those of our clients. However, we represent that we will not knowingly or deliberately favor its personal or personally-controlled accounts over those of our clients. If, in future, the firm trades for its own account, clients will be permitted to inspect the firm's trading records and those of the principal's or employees, upon request.
- (3) Price volatility, occasional variations in liquidity, and differences in order execution may cause us to be unable to obtain identical trade executions for all clients. Such variations and differences may produce slight performance disparity in the accounts over time. In an effort to treat all clients fairly, when orders are filled at different prices, they are assigned on a systematic basis among all accounts.
- (4) Since Di Tomasso Group has the potential to earn a performance fee for performance, there may be inducement for our firm to make more risky investments than if there were no performance fee.

Potential clients should be aware that these and other potential conflicts of interest are frequently inherent in situations employing commodity trading advisors. However, we are committed to treating each client with fairness, and we intend at all times to act in the best interest of all clients.

## **Privacy Information**

Di Tomasso Group recognizes and respects the privacy expectations of its clients and is committed to safeguarding its clients' nonpublic personal information. These privacy disclosures apply to former clients as well as current clients, and to individuals who have provided the Advisor with nonpublic personal information but who have not become the Advisor's clients.

The following privacy disclosure describes the standards that Di Tomasso Group follows for the collection, use and protection of the client's nonpublic personal information.

**Information Di Tomasso Group Collects.** The Advisor collects nonpublic personal information about clients from the following sources: (i) information on account documents or other forms, which may include a client's name, address, tax identification number, age, marital status, number of dependents, assets, debts, income, employment history, beneficiary information and personal bank account information; (ii) information from a client's transactions with the Advisor, such as account history or balance; and (iii) correspondence, whether written, telephonic or electronic, between a client, the Advisor and/or any service providers for a client's account. "Nonpublic personal information" is nonpublic information about a client that the Advisor obtains in connection with providing a client with a financial product or service for a client's personal, family, or household purposes.

**Information Di Tomasso Group Discloses.** The Advisor does not disclose any nonpublic personal information about a client to non-affiliated third parties, except to service providers and as otherwise permitted by law. The Advisor does not sell any personal information about a client to any third party. In the normal course of business, all of the nonpublic personal information the Advisor collects about a client, as described above, may be shared with other persons who provide services in connection with the account (including brokers, administrators, custodians, accountants or attorneys, as well as any other service providers for the account). The Advisor may also disclose personal information with non-affiliated entities and regulatory authorities as permitted by applicable

law. For example, the Advisor may disclose such information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect the Advisor's rights and property.

**Protection of Information.** The Advisor treats nonpublic personal information in a confidential manner and limits access to the nonpublic personal information it has about clients to its employees, affiliates and financial services providers who have an appropriate reason to access it, and to third parties to which a client has requested such disclosure. In addition, the Advisor endeavors to maintain appropriate physical, electronic and procedural safeguards to protect such information and requires third parties with whom it shares such information to maintain such safeguards as well.

## **Anti-Money Laundering Information**

In order to comply with laws and regulations aimed at the prevention of money laundering and prohibiting transactions with certain countries, organizations and individuals, Di Tomasso Group may request such information as it reasonably believes necessary to verify the identity of a client and to determine whether a client is permitted to be a client of the Advisor under such laws and regulations. In the event of delay or failure by a client to produce any information required by the Advisor for these purposes, the Advisor may close a client's account or may refuse to accept an account of a prospective client. Likewise, after reviewing the information provided, it is possible that the Advisor may determine to close a client's account or refuse to accept a new account. In certain circumstances, the Advisor may be required to provide information about a client to regulatory authorities and to take any further action as may be required. Di Tomasso Group will not be liable for any loss or injury to a client that may occur as a result of disclosing such information or refusing or closing an account.

## **Additional Information**

The Di Tomasso Group offers clients and prospective clients the opportunity to obtain additional information and to ask questions and receive answers concerning the Advisor and its trading program. The firm maintains a website at [www.ditomassogroup.com](http://www.ditomassogroup.com).