# **DISCLOSURE DOCUMENT**

# MOBIUS ASSET MANAGEMENT, INC.

John R. McLane, President 6001 East Joan De Arc Scottsdale, Arizona 85254 (480) 948-3869

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

No person is authorized to give any information or make any representations that are not contained in this Disclosure Document.

### THE DATE OF THIS DISCLOSURE DOCUMENT IS June 1, 2019

The delivery of this Disclosure Document at any time does not imply that the information contained herein is correct as of the time subsequent to the date shown above. This Disclosure Document is not to be distributed under any circumstances after May 31, 2020 and will be superseded by that date with a Disclosure Document containing then current information about this Trading Advisor and its trading programs.

# **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 ALL TRANSACTION COSTS

IF YOU PURCHASE OR SELL A COMMODITY FUTURES CONTRACT OR SELL A COMMODITY OPTION 0R 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 NECESSAY FOR THOSE ACCOUNTS THAT ARE SUBJECT TO THESE CHARGES TO MAKE SUBSTANTIAL TRADING PROFITS TO AVOID DEPLETION OR EXHAUSTION OF THEIR ASSETS. THE DISCLOSURE DOCUMENT CONTAINS, AT PAGE 11-12 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 THERFORE CAREFULLY STUDY THIS DISCLOSURE DOCUMENT AND COMMODITY INTEREST TRADING BEFORE YOU TRADE, INCLUDING THE DESCRIPTION OF THE PRINCIPAL RISK FACTORS OF THIS INVESTMENT, AT PAGES 8-11

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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# **COMMODITY TRADING ADVISOR**

### Mobius Asset Management, Inc.

Mobius Asset Management, Inc. (the "Advisor"). An Arizona corporation is registered with the Commodity Futures Trading Commission ("CFTC") as a Commodity Trading Advisor ("CTA") and is a member of the National Futures Association ("NFA") in such capacity. The principal business address of the Advisor is 6001 East Joan De Arc, Scottsdale, Arizona 85254, telephone: (480) 948-3869.

### **Date of the Disclosure Document**

The Advisor first intends to use this Disclosure Document on June 1, 2019 The delivery of this document at any time does not imply that the information contained herein is correct as of any time subsequent to the date shown above.

# **BUSINESS BACKGROUND OF THE ADVISOR AND ITS PRINCIPALS**

# The Advisor

The Advisor was incorporated on June 1, 1996 in Arizona. On April 9, 1997, the advisor became registered as a CTA and has been a member of the NFA in that capacity since such date. As of April 9, 1997, the Advisor succeeded to the business, operations and assets, and assumed the liabilities of the sole proprietorship CTA operated by John R. McLane. Mr. McLane and Howell S. Wynne are the principals of the Advisor along with being sole shareholders with Mr. McLane serving as President and Mr. Wynne as Vice-President.

### **Principals of the Advisor**

**John R. McLane** as of April 9, 1997 is both president and a principal of the Advisor. He became registered with the CFTC on October 20, 1995. He has been a member of the NFA in that capacity since that date. As of July 21, 1997, Mr. McLane transferred his registration as a sole proprietorship CTA to associated person of Mobius Asset Management Inc. on April 9, 1997

Mr. McLane was born in 1952 and is a 1974 Xavier University graduate with a Bachelor of Arts degree in Political Science. Mr. McLane has past experience in the futures industry. During his tenure at major financial institutions, he served as both a retail and institutional futures specialist. Utilizing his historical experience, Mr. McLane started to develop the trading programs described below in 1994.

In addition to managing Mobius Asset Management, Inc. Mr. McLane operated as an Associated Person, on April 2001, and a Branch Office Manager, on May 1, 2001 for Peregrine Financial Group, Inc., a Futures Commission Merchant (FCM) until his withdrawal, effective. May 31, 2009. He also was a principal of BuyLowSellHigh.NetLLC, a Guaranteed Introducing broker (IB), effective March 10, 2009 and an associated person of the IB effective May 8, 2009 until its withdrawal, effective 8/12/2012. Additionally, he was also an Associated Person and Branch manager in Scottsdale, Arizona for Index FX LLC which is an Independent Introducing Broker doing business as Index Futures Group with its main office in Chicago, II effective 2/14/2013 until his withdrawal, effective 5/14/2014

Mr. McLane operated as an Associated Person in Scottsdale, Arizona for CTAAX Partners LLC which is a Guaranteed Introducing Broker for RJ O'Brien Associates LLC effective 5/7/2014. Mr. Mclane was a Principal with CTAX Partners on October 30, 2014. Mr. McLane was also registered as a Branch Office Manager of CTAX Partners LLC effective October 30, 2014 Effective September 11,2017 Mr. McLane withdrew his association with CTAX Partners, withdrawing as an Associated Person, Branch Office Manager and principal.

The performances of the accounts traded by the Advisor are included herein as Capsules A (Client), B (Client), C (Client), D (Client), E (Client) and F (Client) beginning at page 15.

**Howell S. Wynne** is the Vice-President and a principal of the Advisor. Mr. Wynne became a principal of the Advisor on April 9, 1997. Mr. Wynne is a private investor. Mr. Wynne currently holds a minority interest in Primexx Energy Partners, Dallas, TX which specializes in oil and gas exploration. He also carries a majority interest in Dogleg Right Partners LP, a golf equipment business, located in Plano, TX.

Mr. Wynne was registered as an Associated Person from May 22, 1990 until January 30, 1993 and listed as a Principal from October 26, 1989 until January 30, 1993 of DeAngelis Trading Corporation, which was a CTA. Additionally, Mr. Wynne was listed as a principal from November 11, 1988 until January 30, 1993 and registered as an Associated Person from November 11, 1988 until January 30, 1993 and a Branch Office Manager from October 16, 1991 until January 30, 1993 of Crown Capital Management, Inc., which was a CTA. Mr. Wynn was a passive investor for both DeAngelis Trading Corporation and Crown Capital Management Inc. He had no trading duties and his activities were confined to office administration. From January 1993 to April 1997, Mr. Wynne tended to his private business interests mentioned above.

Mr. Wynne was born in 1959 and is a 1981 graduate of Vanderbilt University with a Bachelor of Arts degree in Business Administration. Mr. Wynne resides in Rancho Santa Fe, California.

# **Proprietary Trading**

The Advisor or its principals may, from time to time, trade commodity interests for their own accounts. Clients will be permitted to inspect the trading records of such proprietary trading, and any written policies with respect thereto, at the Advisor's business office during regular business hours. Please see "Conflict of Interest" Below.

# TRADING PROGRAMS

The Advisor presently offers the Energy Trading Program, X-Ceed Trading Program and MCR Trading Program to clients seeking professional money management assistance.

The following descriptions are of necessity brief and are not intended to be exhaustive.

# **Energy Trading Program**

The Mobius Asset Management **Energy Trading Program** combines both Trend Following and Counter Trend systematical technical methodologies. Trading decisions are driven by a proprietary multi-system approach that seeks to capture changes in short term and long-term price momentum. One of the significances of the program is its capacity to respond quickly to directional changes. The Program was developed with a minimum investment of \$250,000 in order to give both individual and institutional investors the opportunity to invest in a professional and highly disciplined non-traditional trading approach. Additional funds can be added in \$250,000 increments.

The commodities currently traded in the **Energy Trading Program** includes, Crude Oil, Heating Oil, Unleaded Gasoline, Natural Gas, Gold, Treasury Bonds and Treasury Notes. The advisor reserves the right to add and delete commodities when needed and without prior notice.

A strict money management discipline is in place. The Mobius risk management overlay utilizes pre-determined stop loss points, which attempt to limit losses and protect gains. Each commodity traded has specific entry and exit points along with stop levels for existing positions. These are updated daily. It should be noted that stop-loss points are not guaranteed to limit loss to the stop-loss price because they are determined by the Advisor's evaluation of historical market volatility and liquidity. The margin to equity ratio will be approximately 4-8%.

# X-CEED TRADING PROGRAM

The Mobius Asset Management **X-Ceed Trading Program** selects and trades from a list of over 25 major commodities and futures contracts including financial, metals, softs, grains and energies. Trades are selected by the manager based on his experience. Usually no more than 10 different commodities will be traded at a time. Trading decisions are a combination of technical indicators, various time periods, money management principles and the overall experience of the manager.

John McLane views risk management as important as returns. In order to maintain appropriate levels of risk and account volatility, the trading manager monitors the portfolio continuously throughout the course of each trading day. There is an attempt to anticipate sources of risk for each commodity and trade. Specific modeling tools are adapted to minimize risk and there are stop losses on every trade. Various profit objectives are used, depending on the commodity and the market in general. The trade itself is not necessarily so important, but making money is basic and the predominant goal.

Accounts are offered and traded in \$150,000 units. Currently all trading is on a single contract basis per unit.

# MCR TRADING PROGRAM

The Mobius Asset Management **MCR Trading Program** is a fully discretionary trading program, based on both systematic trading models and fundamental analysis. It's key to enforce discipline and consistency. The primary objective of the trading program is to detect early trend development and to be positioned in the direction of the market. Market entry and exit signals are activated by a specific set of proprietary trading rules based on daily market data. The program is designed to exit losses quickly while allowing profits to accrue. The trading program was developed with a minimum investment of \$150,000 in order to allow investors the opportunity to invest in a professional and highly disciplined non-traditional trading approach. Additional funds can be added in \$150,000 increments. The commodities traded include future contracts including, financials, metals, grains, energies, livestock and softs.

The trading manager views risk management as important as returns. In order to prescribe to the main parameters of the trading program the trading manager will continuously monitor the portfolio on a daily basis. Specific modeling tools will be enforced in order to minimize risk. Each trade is crucial for the success of the trading program but the main thrust is making money overall.

Accounts are offered and traded in \$150,000 units.

# PRINCIPAL RISK FACTORS

Investing in Commodity Interests involves a HIGH DEGREE OF RISK. Although the Advisor will attempt to reduce risk through the measures described above, no guarantee can be made that substantial losses will not in fact be incurred. Listed below are the primary risk factors associated with the Advisor's Trading Program. Prospective investors should carefully consider the risks set forth below, as well as the risks set forth in the "Risk Disclosure Statement" in the forepart of this document, before deciding to participate in the Advisor's Program.

# **Trading in Commodity Interest is Speculative and Volatile**

Commodity interest prices are highly volatile. Price movements for commodity interests are influenced by, among other things: changing supply and demand relationships; weather; agricultural, trade, fiscal, monetary, and exchange control programs and policies of governments; United States and foreign political and economic events and policies; changes in national and international interest rates and rates of inflation; currency devaluations and revaluations; and emotions of the marketplace. None of these factors can be controlled by Mobius Asset Management, Inc. and no assurance can be given that Mobius Asset Management Inc.'s advice will result in profitable trades for a participating customer or that a customer will not incur substantial losses.

# **Commodity Trading May be Illiquid**

Most United States commodity exchanges limit price fluctuations in certain commodity interest prices during a single day by means of "daily price fluctuation limits" or "daily limits." The daily limit, which is set by most exchanges for all but a portion of the expiration month, imposes a floor and a ceiling on the prices at which a trade may be executed, as measured from the last trading day's close. While these limits were put in place to lessen margin exposure, they may have certain negative consequences for a customer's trading. For example, once the price of a particular contract has increased or decreased by an amount equal to the daily limit, thereby producing a "limit-up" or "limit-down" market, positions in the contract can neither be taken nor liquidated unless traders are willing to effect trades at or within the limit. Contract prices in various commodities have occasionally moved the daily limit for several consecutive days with little or no trading. Similar occurrences could prevent Mobius Asset Management, Inc. from promptly liquidating unfavorable positions and subject a participating customer to substantial losses that could exceed the margin initially committed to such trades.

# Trading Decisions Based on Technical Strategies

The Advisor employs, in large part, trading strategies, which seek to take into account certain "technical" factors in identifying priced trends and price movements. The buy and sell signals generated by a technical trading system are not based on analysis of fundamental supply and demand factors, general economic factors or anticipated world events, but generally upon a study of actual inter-day, daily and weekly price fluctuations, volume variations and changes in open interest. The profitability of any diversified technical trading strategy depends upon occurrence in the future of major price moves or trends in some commodity interest. In the past there have been periods without discernable trends and presumably similar periods will occur in the future. The best trading strategy will not be profitable if there are no trends of the kind it seeks to follow. Any

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factor which may lessen the prospect of major trends in the future (such as increased government control of, or participation in, the markets) may reduce the prospect that any trading strategy will be profitable in the future. Any factor, which would make it more difficult to execute trades at the system's signal prices, such as a significant lessening of liquidity in a particular market, could be detrimental to profitability.

## **Possible Effects of Trend-Following Systems**

Commodity trading strategies employing trend-following signals based on technical factors are not new, and, if many traders in addition to the Advisor follow very similar strategies, a bunching of buy and sell orders could occur. It is possible that there has been an increase in recent years in both the use of trend-following strategies and the overall volume of trading and liquidity of the commodity markets. Consequently, it is difficult to determine whether the total amount of funds traded on a trend-following basis, either for futures as a whole or for a particular commodity is greater in proportion to the overall volume and liquidity of commodity markets than in the past. The effect of the increase, if any, in the proportion of funds traded pursuant to trend-following strategies in recent years cannot be predicted. Any such increase, however, could alter trading patterns or effect of trades to detriment of the client.

### Substantial Fees and Expenses

Each client is responsible to the futures commission merchant it selects (see "Futures Commission Merchant" below) for all margin, commissions and other brokerage costs including but not limited to "give up fees". Brokerage costs can be substantial, especially in light of the active trading required to meet the Program's objectives. For example, an account with a Nominal Size of \$1,000,000 traded pursuant to one of the Advisor's Programs can expect 3000 round turns annually. At \$20 per round-turn trade all in, the brokerage commission cost will be equal to approximately 6% per year. These figures are based on the actual experience of the Advisor's Program. The trading frequency may vary in the future due to such market variables as volatility and liquidity.

The Advisor reserves the right to establish relationships and enter into agreements on behalf of the client with one or more executing brokers and to trade through such executing brokers. If an executing broker does not clear his trades through the same clearing broker utilized by the client account, the executing brokers will "give-up" or transfer the positions to the account's clearing broker. Most clearing brokers charge their accounts an additional \$1.50-3.00 per round turn per contract for such "give-ups".

As set forth below, clients are responsible to the Advisor for monthly fees based on the Nominal Account Size of their accounts without regard to the profitability of trading in the account. Finally, clients also are responsible for paying to the Advisor an incentive fee based on the client's quarterly trading profits. As a result, a client must earn substantial trading profits to cover expenses and avoid depleting actual account equity.

# Tax Matters

Mobius Asset Management, Inc. is not an expert on tax matters and does not provide tax advice. Prospective clients should consult with their own financial advisor on tax questions related to commodity investments.

# Stop Loss Orders May Not Limit Loss

It should be noted that stop-loss points are not guaranteed to limit loss to the stop-loss point because in part, they are determined by the Advisor evaluation of historical market volatility and liquidity. Changes in volatility, overnight market movements, slippage in trade execution and exchange price limit changes may lead to losses that are in excess of the stop-loss limit. Trailing stop-loss orders are used in an attempt to protect the account from severe market reversals or reduce the potential of greater loss.

# **Futures Trading Is Highly Leveraged**

The low margin deposits normally required in commodity interest trading (typically 2% to 15% of the value of the contract purchase or sold) permit an extremely high degree of leverage. Accordingly, a relatively small price movement in a contract may result in immediate and substantial losses to the investor. For example, if at the time of purchase 10% of the price of a futures contract is deposited as margin, a 10% decrease in the price of the contract would, if the contract is then closed out, result in a total loss of the margin deposit before any deductions for brokerage commissions. A decrease of more than 10% would result in a loss of more than the total margin deposit. Thus, like other leveraged investments, any trade may result in losses in excess of the amount invested.

When the market value of a particular open position changes to a point where the margin on deposit in a participating customer's account does not satisfy the applicable maintenance margin requirement imposed by the FCM, the customer, and not Mobius Asset Management, Inc, will receive a margin call from the FCM. If the customer does not satisfy the margin call within a reasonable time (which may be as brief as a few hours) the FCM will close out the customer's position.

# Participating Customer's FCM May Fail

Under CFTC regulations, FCM's are required to maintain customer's assets in a segregated account. If a customer's FCM fails to do so, the customer may be subject to risk of loss of funds in the event of its bankruptcy. Even if such funds are properly segregated, the customer may still be subject to a risk of a loss of his funds on deposit with the FCM should another customer of the FCM or the FCM itself fail to satisfy deficiencies in such other customer's accounts. Bankruptcy law applicable to all U.S. futures brokers requires that, in the event of the bankruptcy of such a broker, all property held by the broker, including certain property specifically traceable to the

customer, will be returned, transferred or distributed to the broker's customers only to the extent of each customer's pro-rata share of all property available for distribution to customers. If any futures broker retained by the customer were to become bankrupt, it is possible that the customer would be able to recover none or only a portion of its assets held by such futures broker.

\* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \* \*

The preceding list of risk factors does not purport to be a complete explanation of the risks involved in investing in the Advisor's Program. Each prospective client who intends to trade commodity futures contracts should carefully read this Disclosure Document, the Risk Disclosure Statement on Page 2 and the risk disclosure statements of the relevant futures commission merchant or introducing broker with particular care, and give due consideration to the risks described therein.

# **FUTURES COMMISSION MERCHANTS**

A client who elects to participate in the Advisor's Program must first open a commodity futures account with a registered futures commission merchant ('FCM"). Clients are free to choose any FCM they wish to carry their account. The client may also elect to use an Introducing Broker ("IB"). Clients are responsible for arrangements and negotiating fees and commissions with the FCM or IB of their choice.

# **MANAGEMENT AND INCENTIVE FEES**

In consideration for the management of its accounts, a client will pay the Advisor a quarterly incentive fee equal to 20% of "Trading Profits," defined below, as of the end of each calendar quarter and a monthly management fee of 0.16% (i.e., 2% annually) of the Nominal Account Size, as described below, as of the end of each calendar month. The Advisor reserves the right to negotiate fees with different clients. Presently, Incentive Fees have a rate of 20%. These fees may be based upon such factors as the type of client, size of account, degree of leverage used, and other factors deemed relevant by the Advisor. Fees, which will be deducted directly from the client's account, will be determined as follows:

1. The Advisor will receive a quarterly incentive fee equal to 20% of "Trading Profits." Trading Profits for purposes of calculating the Advisor's incentive fee during a calendar quarter shall mean the cumulative profits (over and above the aggregate of the previous period profits as of the end of any calendar quarter) during the calendar quarter (after deduction for accrued brokerage fees paid and management fees paid. Trading Profits shall include both realized and unrealized profits. Trading Profits shall include interest earned by the client on its assets. If Trading Profits for a calendar quarter are negative, it shall constitute a "Carry forward Loss" for the beginning of the next calendar quarter. If Trading profits are negative at the time of withdrawal, then any loss attributed to those withdrawn funds shall be deducted from the Carry forward Loss. No Incentive fee shall be payable until Trading Profits for the ensuing calendar quarters exceeds the Carry forward Loss. If Trading Profits are positive at the time of a

withdrawal the incentive fees accrued that portion of the Trading Profits attributed to the withdrawn funds shall be deemed due and payable at the time.

The incentive fee is based upon, among other things, unrealized appreciation of open positions. All incentive fees paid will be retained by the Advisor even if the account subsequently experiences losses or the appreciation is never realized. The amount of unrealized appreciation may be substantial. Because the incentive fee is payable quarterly, substantial incentive fees may be paid to the Advisor during a year even though the account sustains a net trading loss for that year

2. The advisor will receive a monthly management fee of 0.16% of the Nominal Account Size (2% annually). Nominal Account Size shall mean an account's total actual assets on less total liabilities, to be determined on the basis of generally accepted accounting principles, consistently applied unless otherwise specified. Nominal Account Size will include the sum of all cash, Treasury Bills and other interest-bearing obligations at their cost plus accrued interest, all other accrued interest earned by the Client on its assets, any dollar amount that the Client has stated is subject to the Advisor's trading discretion but may not be deposited in the trading account, whether treated as notional funds, committed funds or otherwise, and the current market value of all open commodity positions, as indicated by the settlement price determined by the exchanges on which such positions are maintained. If there are no trades on the date of calculation due to the operation of the daily price fluctuation limits or due to closing of the exchange on which positions are maintained, the contract will be valued at the nominal settlement prices as determined by the exchange. No reduction shall be made for brokerage commissions and other charges, which would be incurred upon liquidation. The management fee will be paid to the Advisor whether or not trading has been profitable. Management fees accrued on funds withdrawn from Client's account are deemed due and payable at the time of withdrawal. Client understands that since the Nominal Account Size may include notional funds (see "Notional Funds Disclosure below), Client may be paying a management fee not only on actual funds but on notional fund as well. As a result, the management fee expressed, as a percentage of the actual funds may be higher than set forth above.

The management fee will be paid to the Advisor whether or not trading has been profitable. Management fees accrued on accounts, which have reduced the Nominal Account Size, will be charged pro rata.

# **CONFLICTS OF INTEREST**

Due to price volatility, occasional variations in liquidity, and differences in order execution, it is not always possible for the Advisor to obtain identical trade execution for all of its clients. Such variations and differences may produce differences in performance among client accounts over time. In order to treat its clients fairly when block orders for clients are filled at different prices, the Advisor will assign trades on a predetermined, fair and systematic basis among all accounts it manages based on information about order execution it receives from the FCM's carrying the client accounts managed by the Advisor.

The Advisor and the principals may trade for their own accounts. Orders for the aforementioned accounts may or may not be part of a block order. The principals' orders could be placed before Mobius Asset Management, Inc June 1, 2019 12

or after other orders for client accounts and might obtain more favorable order execution. No accounts owned by the Advisor or its principals will be deliberately favored by the Advisor or its principals over client accounts. Clients will be permitted to inspect the records of the Advisor and its principals' accounts, and any written policies thereto, during regular business hours at the Advisor's business office.

The Advisor may enter into arrangements with Commodity Pool Operators, Futures Commission Merchants, Introducing Brokers, and Commodity Trading Advisors pursuant to which such entities introduce clients to the Advisor. In such cases, these entities may receive a portion of the fees paid by the client to the Advisor.

Mobius Asset Management charges an incentive fee of 20% based on new net trading profits. It is not penalized for losses in an account, although it would not be eligible to receive a future incentive fee until new net trading profits were again earned for an account. If Mobius Asset Management were to trade more aggressively for an account than its trading programs indicate in order to earn an incentive fee, Mobius Asset Management would have an actual or potential conflict of interest between its interest in earning an incentive fee and its obligation to trade each account in the best interests of the client.

# **NOTIONAL FUNDS DISCLOSURE**

Since the Advisor may accept partially funded accounts, the following disclosure is included:

You should request the Advisor to advise you of the amount of cash or other assets (Actual Funds), which should be deposited to the Advisor's trading program for your account to be considered "Fully Funded." This is the amount upon which the Advisor will determine the number of contracts traded in your account and should be sufficient to make it unlikely that any further cash deposits would be required from you over the course of your participation in the Advisor's program, although there can be no assurance of this.

You are reminded that the account size you agreed to in writing, the Nominal Account Size, is not the maximum possible loss that your account may experience. Further, cash additions, cash withdrawals, and net performance will affect the Nominal Account Size or its trading. Clients considering opening a notionally funded account with Mobius Asset Management, Inc. should be certain that they fully understand the consequences of the increased leverage inherent in this type of account as compared to a fully funded account. Due to this increased leverage, such an account will experience greater percentage losses as well as greater percentage gains than if the account were fully funded at the nominal account size. The Nominal Account Size will increase or decrease when you elect a new nominal account size. At that time you must sign a new advisory agreement with Mobius Asset Management, Inc.

You should consult the account statements received from your futures commission merchant in order to determine the activity in your account, including profits, losses and current cash equity balance. To the extent that the equity in your account is at any time less than the Nominal Account Size you should be aware of the following:

1. Although your gains and losses, fees and commissions measured in dollars will be the same, they will be greater when expressed as a percentage of account equity.

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2. You may receive more frequent and larger margin calls from the Futures Commission Merchant.

# Performance Disclosure Table

Notional funds are defined as the amount by which the Nominal Account Size exceeds the amount of Actual Funds on deposit in the account. A prospective investor who plans to partially fund an account in lieu of providing full funding should first interpolate the rate of return information in the following table with respect to partial funding and to the impact of additional leverage on account volatility. The Fully Funded Rate of Return is the actual net trading performance divided by the Nominal Account Size recommended by the Advisor.

Fully Funded Rates of Return based on various funding levels Actual ROR 30 % 30% 60% 75% 100% 67% 20% 20% 40% 50% 10% 10% 20% 25% 33% 0% 0% 0% 0% 0% -10% -10% -20% -25% -33% -40% -20% -20% -50% -67% 100% 40% 30% 50% Level of funding

The following disclosure table may be used to convert the rates of return (ROR) to the corresponding ROR for particular funding levels:

CLIENTS PARTICIPATING IN THE ADVISOR'S TRADING PROGRAM ARE CAUTIONED THAT THE PERFORMANCE INFORMATION SET FORTH IN THE FOLLOWING CAPSULES IS NOT INDICATIVE OF, AND HAS NO BEARING ON, ANY TRADING RESULTS WHICH MAY BE ATTAINED IN THE FUTURE BY THE ADVISOR SINCE PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. THERE CAN BE NO ASSURANCE THAT A CLIENT WILL MAKE ANY PROFITS AT ALL, OR WILL BE ABLE TO AVOID INCURRING SUBSTANTIAL LOSSES

# PERFORMANCE RECORDS

The performance contained in the following capsules through March 2019 represents client accounts managed by the Advisor pursuant to the Energy Trading Program, X-Ceed Trading Program, MCR Trading Program, Custom Trading Program, Diversified Program and Discretionary Flex Trading Program. Although the information has not been audited, in the opinion of the Advisor it is accurate and fairly stated in all material respects.

Since past performance is not necessarily indicative of future results, the performance results set forth in the following Capsules may not be indicative of the results, which may be achieved by the Advisor in the future. No representation is being made that any account will or is likely to achieve profits or incur losses similar to those shown. Certain trading methods considered appropriate to large accounts owned by professional traders may be deemed inappropriate for accounts, which have less equity and/or are owned by clients with a greater aversion to risk. In addition, because the Advisor has modified and will continue to modify its trading methods, the results shown do not reflect the precise trading methods that will be used on behalf of the Advisor.

Future performance also may be affected by the increasing amount of funds directed by the Advisor. For example, in certain commodity interest, the Advisor will be unable to acquire positions as large as its strategy might otherwise dictate, because the sizes of these speculative positions are limited by legal regulations. Also, "skid" or "slippage" (difference between ideal and actual trade execution prices, and the transaction cost resulting there from) will increase with the execution of larger orders. And fewer commodity interests will be sufficiently liquid to invest in, reducing diversification and opportunities to profit.

## For all of the above reasons, no client should expect the same performance as that of any other account invested previously, simultaneously or subsequently by the Advisor, its principals, or the performance presented herein, as past performance is not indicative of future results.

Capsule A contains specific information with respect to results for client accounts traded by the Advisor pursuant to the Energy Trading Program from inception of trading for client accounts. The accounts have been charged a quarterly incentive fee ranging from 15% to 20% of Trading Profits and a monthly management fee ranging from 0% to 2% annually of the nominal assets in the account.

Capsule B contains specified information with respect to results of trading for client accounts traded by the Advisor pursuant to the X-Ceed Trading Program from inception of trading for client accounts. The accounts are charged a quarterly incentive fee ranging from 10% to 20% of the Trading Profits and a monthly management fee ranging from 0% to 2% of the nominal assets in the account.

Capsule C contains specified information with respect to results of trading for client accounts traded by the Advisor pursuant to the MCR Trading Program from inception of trading for client accounts. The accounts are charged a quarterly incentive fee of 20% of the Trading Profits and a monthly management fee ranging from 0% to 2% of the nominal assets in the account.

Capsule D contains specified information with respect to results of trading for client accounts traded by the Advisor pursuant to the Custom Trading Program from inception of trading for client accounts. The accounts are charged a quarterly incentive fee ranging from 20% to 27.5% of the Trading Profits and a monthly management fee ranging from 0% to 2% of the nominal assets in the account.

Capsule E contains specified information with respect to results of trading for client accounts traded by the Advisor pursuant to the Diversified Trading Program from inception of trading for client accounts. The accounts are charged a quarterly incentive fee ranging from15%-20% of Trading Profits and a monthly management fee ranging from 0% annually to 2% annually of the nominal assets in the account.

Capsule F contains specified information with respect to results of trading for client accounts traded by the Advisor pursuant to the Discretionary Flex Trading Program from inception of trading for client accounts. The accounts are charged a quarterly incentive fee ranging from 10% to 20% of the Trading Profits and a monthly management fee ranging from 0% to 2% of the nominal assets in the account.

#### PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. Capsule A – <u>Energy Trading Program</u> Client Account Performance (Unaudited)

### Interest Earned by the Client is Not Included in the Table

Name of CTA:		Mobius Asset
	Management, Inc.	
Name of CTA's Trading Program:		Energy Trading
	Program	
Inception of Trading Client Accounts by CTA:	-	January, 1996
Inception of Trading Client Accounts Pursuant to the Program:		January, 2005
Number of Open Client Accounts:		0
Total Client Assets Under Management – Nominal:		\$1,064,813
Total Assets Traded Pursuant to the Program - Nominal:		\$0
Largest Monthly Draw-down on a Composite Account Basis:		-1.99 Aug 2016
Largest Peak-to-Valley Draw-down on a Composite Account Basis:		-31.27 Feb 11– Sept 2018
Number of Profitable Opened and Closed Client Accounts:		22 Range: 0.15% to 17.00%
Number of Unprofitable Opened and Closed Client Accounts:		72 Range: -0.11% to -22.43%

Month	2019	2018	2017	2016	2015	2014	
January	NT	-0.59%	-0.59%	0.35%	-0.73%	-0.94%	
February	NT	-0.58%	-0.67%	1.10%	-0.24%	-1.09%	
March	NT	-0.80%	1.42%	-0.77%	0.06%	-1.15%	
April		-0.36%	-1.28%	-0.83%	0.17%	-1.22%	
May		-0.74%	-0.09%	-1.71%	-0.46%	-0.46%	
June		-0.64%	-1.18%	0.61%	-0.27%	-0.13%	
July		-0.12%	-0.57%	-1.06%	-0.26%	-0.35%	
August		-0.58%	-1.40%	-1.99%	1.66%	-0.11%	
September		-0.21%	-0.56%	-1.57%	-0.89%	-0.19%	
October		NT	-1.59%	-0.32%	1.18%	-0.28%	
November		NT	-1.12%	-0.78%	-0.62%	-0.27%	
December		NT	-0.11%	-0.08%	0.80%	-1.75%	
Annual Rate of Return	NT	-4.53%	-7.19%	-6.88%	0.38%	-7.87%	

### THE NOTES TO PERFORMANCE CAPSULE A ON THE NEXT PAGE

### NOTES TO PERFORMANCE CAPSULE A

A summary of significant accounting policies, which have been followed in preparing the accompanying Capsule A, is set forth below. All performance has been prepared on an accrual basis in accordance with Generally Accepted Accounting Principles.

- (1) "Inception of Trading Client Accounts by CTA" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts.
- (2) "Inception of Trading Client Accounts Pursuant to the Program" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts pursuant to the Trading Program.

(3) "Number of Open Client Accounts" is the number of client accounts directed by the Advisor pursuant to the Trading Program as of the date shown.

(4) "Total Client Assets Under Management - Nominal" is the aggregate amount of client's assets (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading program as the date shown computed on a accrual basis in accordance with Generally Accepted Accounting Practices.

- (5) "Total Assets Traded Pursuant to the Program Nominal" is the amount of client (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading Program as of the date shown, computed on an accrual basis in accordance with Generally Accepted Accounting Principles.
- (6) "Draw-down" means losses experienced by the Trading Program over a specified period expressed as a percentage of beginning net asset value.
- (7) "Largest Monthly Draw-down on an Composite Account Basis" is the largest monthly loss experienced by any composite account traded pursuant to the Trading Program in any calendar month expressed as a percentage of beginning net asset value and includes the month and year of such draw-down.
- (8) "Largest Peak-to-Valley Draw-down on an Composite Account Basis" is the largest cumulative percentage decline in month-end net asset value of any composite account traded pursuant to the Trading Program due to losses sustained by such account during a period in which the initial month-end net asset value of the account is not equaled or exceeded by a subsequent month-end net asset value and includes the time period in which such draw-down occurred.
- (9) "Number of Closed Client Accounts" is the number of client accounts traded pursuant to the Trading Program that were closed as of the date shown, either profitably or unprofitably, as indicated.
- (10) "Monthly Rate of Return" represents net performance for a month divided by beginning Net Asset Value, time weighted for any additions or withdrawals occurring during the month.
- (11) "Annual Rate of Return" represents the cumulative compounded rate of return for each year or portion thereof. It is computed by applying successively the respective monthly rates of return for each month beginning with the first month presented in each period and represents the net percentage change since the beginning of the period presented.
- (12) "NT" represents No Trading occurred within the specified month

#### PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

#### Capsule B – Discretionary X-Ceed <u>Trading Program</u> Client Account Performance (Unaudited)

#### Interest Earned by the Client is Not Included in the Table

Name	of	CTA
INAME	UI.	UIA.

Name of CTA's Trading Program:

Management, Inc.

Mobius Asset

January, 1996

X-Ceed Trading Program

Inception of Trading Client Accounts by CTA: Inception of Trading Client Accounts Pursuant to the Program: Number of Open Client Accounts: Total Client Assets Under Management – Nominal: Total Assets Traded Pursuant to the Program - Nominal: Largest Monthly Draw-down on a Composite Account Basis: Largest Peak-to-Valley Draw-down on a Composite Account Basis: Number of Profitable Opened and Closed Client Accounts: Number of Unprofitable Opened and Closed Client Accounts:

August 2015 8 \$1,064,813 \$901,152 -2.49% Oct 2016 -23.81Aug 15- Mar 2019 0 Range: 23 Range: 0.0% to -34.35%

Month	2019	2018	2017	2016	2015
January	-0.56%	-0.83%	-0.83%	-0.16%	NT
February	-0.96%	-0.39%	-1.72%	0.36%	NT
March	-0.77%	-1.15%	0.26%	-0.43%	NT
April		-0.34%	-1.19%	075%	NT
May		-1.81%	-0.87%	-1.03%	NT
June		-1.37%	-1.03%	1.18%	NT
July		0.12%	-0.95%	-1.75%	NT
August		-1.73%	-0.94%	0.21%	2.59%
September		0.75%	-0.60%	-0.43%	-0.91%
October		-0.59%	-1.28%	-2.49%	-0.94%
November		0.10%	-0.80%	-0.40%	0.49%
December		-1.27%	-0.07%	-0.23%	1.12%
Annual Rate of Return	-2.27%	-8.21%	-9.22%	-5.81%	2.32%

### THE NOTES TO PERFORMANCE CAPSULE B ON THE NEXT PAGE ARE AN INTEGRAL PART OF THIS PERFORMANCE RECORD.

#### NOTES TO PERFORMANCE CAPSULE B

A summary of significant accounting policies, which have been followed in preparing the accompanying Capsule B, is set forth below. All performance has been prepared on an accrual basis in accordance with Generally Accepted Accounting Principles.

- (1) "Inception of Trading Client Accounts by CTA" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts.
- (2) "Inception of Trading Client Accounts Pursuant to the Program" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts pursuant to the Trading Program.

(3) "Number of Open Client Accounts" is the number of client accounts directed by the Advisor pursuant to the Trading Program as of the date shown.

(4) "Total Client Assets Under Management - Nominal" is the aggregate amount of client's assets (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading program as the date shown computed on a accrual basis in accordance with Generally Accepted Accounting Practices.

- (5) "Total Assets Traded Pursuant to the Program Nominal" is the amount of client (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading Program as of the date shown, computed on an accrual basis in accordance with Generally Accepted Accounting Principles.
- (6) "Draw-down" means losses experienced by the Trading Program over a specified period expressed as a percentage of beginning net asset value.
- (7) "Largest Monthly Draw-down on an Composite Account Basis" is the largest monthly loss experienced by any composite account traded pursuant to the Trading Program in any calendar month expressed as a percentage of beginning net asset value and includes the month and year of such draw-down.
- (8) "Largest Peak-to-Valley Draw-down on an Composite Account Basis" is the largest cumulative percentage decline in month-end net asset value of any composite account traded pursuant to the Trading Program due to losses sustained by such account during a period in which the initial month-end net asset value of the account is not equaled or exceeded by a subsequent month-end net asset value and includes the time period in which such draw-down occurred.
- (9) "Number of Closed Client Accounts" is the number of client accounts traded pursuant to the Trading Program that were closed as of the date shown, either profitably or unprofitably, as indicated.
- (10) "Monthly Rate of Return" represents net performance for a month divided by beginning Net Asset Value, time weighted for any additions or withdrawals occurring during the month.
- (11) "Annual Rate of Return" represents the cumulative compounded rate of return for each year or portion thereof. It is computed by applying successively the respective monthly rates of return for each month beginning with the first month presented in each period and represents the net percentage change since the beginning of the period presented.
- (12) "NT" represents No Trading occurred within the specified month

#### PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. Capsule C –MCR<u>Trading Program</u> Client Account Performance (Unaudited)

### Interest Earned by the Client is Not Included in the Table

Name of CTA:	Management Inc.	Mobius Asset
	Management, Inc.	
Name of CTA's Trading Program:		MCR Program
Inception of Trading Client Accounts by CTA:		January 1996
Inception of Trading Client Accounts Pursuant to the Program:		February 2019
Number of Open Client Accounts:		1
Total Client Assets Under Management – Nominal:		\$1,064,813
Total Assets Traded Pursuant to the Program - Nominal:		\$163,661
Largest Monthly Draw-down on a Composite Account Basis:		-0.39% Feb 2019
Largest Peak-to-Valley Draw-down on a Composite Account Basis:		-0.39% Feb 2019
Number of Profitable Opened and Closed Client Accounts:		0
Number of Unprofitable Opened and Closed Client Accounts:		0

Month	2019
January	NT
February	-0.39%
March	0.79%
April	
May	
June	
July	
August	
September	
October	
November	
December	
Annual Rate of Return	0.48%

### THE NOTES TO PERFORMANCE CAPSULE C ON THE NEXT PAGE ARE AN INTEGRAL PART OF THIS PERFORMANCE RECORD.

### NOTES TO PERFORMANCE CAPSULE C

A summary of significant accounting policies, which have been followed in preparing the accompanying Capsule C, is set forth below. All performance has been prepared on an accrual basis in accordance with Generally Accepted Accounting Principles.

- (1) "Inception of Trading Client Accounts by CTA" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts.
- (2) "Inception of Trading Client Accounts Pursuant to the Program" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts pursuant to the Trading Program.
- (3) "Number of Open Client Accounts" is the number of client accounts directed by the Advisor pursuant to the Trading Program as of the date shown.
- (4) "Total Client Assets Under Management Nominal" is the aggregate amount of client's assets (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading program as the date shown computed on a accrual basis in accordance with Generally Accepted Accounting Practices.
- (5) "Total Assets Traded Pursuant to the Program Nominal" is the amount of client (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading Program as of the date shown, computed on an accrual basis in accordance with Generally Accepted Accounting Principles.
- (6) "Draw-down" means losses experienced by the Trading Program over a specified period expressed as a percentage of beginning net asset value.
- (7) "Largest Monthly Draw-down on an Composite Account Basis" is the largest monthly loss experienced by any composite account traded pursuant to the Trading Program in any calendar month expressed as a percentage of beginning net asset value and includes the month and year of such draw-down.
- (8) "Largest Peak-to-Valley Draw-down on an Composite Account Basis" is the largest cumulative percentage decline in month-end net asset value of any composite account traded pursuant to the Trading Program due to losses sustained by such account during a period in which the initial month-end net asset value of the account is not equaled or exceeded by a subsequent month-end net asset value and includes the time period in which such draw-down occurred.
- (9) "Number of Closed Client Accounts" is the number of client accounts traded pursuant to the Trading Program that were closed as of the date shown, either profitably or unprofitably, as indicated.
- (10) "Monthly Rate of Return" represents net performance for a month divided by beginning Net Asset Value, time weighted for any additions or withdrawals occurring during the month.
- (11) "Annual Rate of Return" represents the cumulative compounded rate of return for each year or portion thereof. It is computed by applying successively the respective monthly rates of return for each month beginning with the first month presented in each period and represents the net percentage change since the beginning of the period presented.
- (12) "NT" represents No Trading occurred within the specified month

#### PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. Capsule D – <u>Custom Trading Program</u> Client Account Performance (Unaudited)

### Interest Earned by the Client is Not Included in the Table

Name of CTA:		Mobius Asset
Name of CTA's Trading Program:	Management, Inc. Program	Custom Trading
Inception of Trading Client Accounts by CTA: Inception of Trading Client Accounts Pursuant to the Program: Number of Open Client Accounts: Total Client Assets Under Management – Nominal: Total Assets Traded Pursuant to the Program - Nominal: Largest Monthly Draw-down on a Composite Account Basis: Largest Peak-to-Valley Draw-down on a Composite Account Basis:		January 1996 January 2003 0 \$1,064,813 \$0 -5.90 Dec 2014 -50,63 Dec 2010-Mar 2016
Number of Profitable Opened and Closed Client Accounts: Number of Unprofitable Opened and Closed Client Accounts:		49 Range: 0.05% to 43.33% 95 Range: -0.13% to -36.70%

Month	2019	2018	2017	2016	2015	2014	
January	NT	NT	NT	-0.62%	1.64%	0.22%	
February	NT	NT	NT	-0.74%	-2.21%	-2.37%	
March	NT	NT	NT	-0.67%	-0.19%	-1.49%	
April		NT	NT	NT	-1.72%	-1.98%	
May		NT	NY	NT	-1.70%	-0.16%	
June		NT	NT	NT	-2.00%	0.45%	
July		NT	NT	NT	-1.42%	NT	
August		NT	NT	NT	-0.64%	NT	
September		NT	NT	NT	-1.43%	1.71%	
October		NT	NT	NT	-1.78%	-5.69%	
November		NT	NT	NT	-2.01%	-1.95%	
December		NT	NT	NT	0.33%	-5.90%	
Annual Rate of Return	NT	NT	NT	-2.02%	-12.43%	-16.13%	

The Custom Trading Program ceased trading in March 2016 and is no longer offered by the Advisor

THE NOTES TO PERFORMANCE CAPSULE C ON THE NEXT PAGE ARE AN INTEGRAL PART OF THIS PERFORMANCE RECORD.

### NOTES TO PERFORMANCE CAPSULE D

A summary of significant accounting policies, which have been followed in preparing the accompanying Capsule C, is set forth below. All performance has been prepared on an accrual basis in accordance with Generally Accepted Accounting Principles.

- (1) "Inception of Trading Client Accounts by CTA" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts.
- (2) "Inception of Trading Client Accounts Pursuant to the Program" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts pursuant to the Trading Program.
- (5) "Number of Open Client Accounts" is the number of client accounts directed by the Advisor pursuant to the Trading Program as of the date shown.
- (6) "Total Client Assets Under Management Nominal" is the aggregate amount of client's assets (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading program as the date shown computed on a accrual basis in accordance with Generally Accepted Accounting Practices.
- (5) "Total Assets Traded Pursuant to the Program Nominal" is the amount of client (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading Program as of the date shown, computed on an accrual basis in accordance with Generally Accepted Accounting Principles.
- (6) "Draw-down" means losses experienced by the Trading Program over a specified period expressed as a percentage of beginning net asset value.
- (7) "Largest Monthly Draw-down on an Composite Account Basis" is the largest monthly loss experienced by any composite account traded pursuant to the Trading Program in any calendar month expressed as a percentage of beginning net asset value and includes the month and year of such draw-down.
- (8) "Largest Peak-to-Valley Draw-down on an Composite Account Basis" is the largest cumulative percentage decline in month-end net asset value of any composite account traded pursuant to the Trading Program due to losses sustained by such account during a period in which the initial month-end net asset value of the account is not equaled or exceeded by a subsequent month-end net asset value and includes the time period in which such draw-down occurred.
- (9) "Number of Closed Client Accounts" is the number of client accounts traded pursuant to the Trading Program that were closed as of the date shown, either profitably or unprofitably, as indicated.
- (10) "Monthly Rate of Return" represents net performance for a month divided by beginning Net Asset Value, time weighted for any additions or withdrawals occurring during the month.
- (11) "Annual Rate of Return" represents the cumulative compounded rate of return for each year or portion thereof. It is computed by applying successively the respective monthly rates of return for each month beginning with the first month presented in each period and represents the net percentage change since the beginning of the period presented.
- (12) "NT" represents No Trading occurred within the specified month

#### PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS. Capsule E – <u>Diversified Trading Program</u> Client Account Performance (Unaudited)

### Interest Earned by the Client is Not Included in the Table

Name of CTA:		Mobius Asset
Name of CTA's Trading Program:	Management, Inc. Program	Diversified Trading
Inception of Trading Client Accounts by CTA:	-	January, 1996
Inception of Trading Client Accounts Pursuant to the Program:		March, 2004
Number of Open Client Accounts:		0
Total Client Assets Under Management – Nominal:		\$1,064,813
Total Assets Traded Pursuant to the Program - Nominal:		\$0
Largest Monthly Draw-down on a Composite Account Basis:		-4.12% June 2013
Largest Peak-to-Valley Draw-down on a Composite Account Basis:		-38.84% Dec 11 – Mar 17
Number of Profitable Opened and Closed Client Accounts:		8 Range: 0.6% -32.43%)
Number of Unprofitable Opened and Closed Client Accounts:		10 Range:-3.1% - 22.71%

Month	2019	2018	2017	2016	2015	2014	
January	NT	NT	-3.33%	-1.13%	-0.77%	-0.54%	
February	NT	NT	-4.06%	-1.43%	-1.34%	-1.83%	
March	NT	NT	-1.41%	-3.15%	0.41%	-1.95%	
April		NT	NT	-1.76%	-1.25%	-0.41%	
May		NT	NT	-0.92%	0.00%	-0.27%	
June		NT	NT	0.14%	-0.75%	0.35%	
July		NT	NT	-1.71%	-1.29%	0.58%	
August		NT	NT	-2.14%	-0.12%	-0.10%	
September		NT	NT	-1.29%	-1.12%	0.24%	
October		NT	NT	-1.32%	-0.82%	-0.83%	
November		NT	NT	-1.91%	-0.15%	2.03%	
December		NT	NT	-1.71%	-0.88%	-0.62%	
Annual Rate of Return	NT	NT	-8.56%	-5.61%	-7.81%	-3.35%	

The Mobius Diversified Trading Program ceased trading in March 2017 is no longer offered by the Advisor

### THE NOTES TO PERFORMANCE CAPSULE E ON THE NEXT PAGE ARE AN INTEGRAL PART OF THIS PERFORMANCE RECORD.

### NOTES TO PERFORMANCE CAPSULE E

A summary of significant accounting policies, which have been followed in preparing the accompanying Capsule D, is set forth below. All performance has been prepared on an accrual basis in accordance with Generally Accepted Accounting Principles.

- (1) "Inception of Trading Client Accounts by CTA" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts.
- (2) "Inception of Trading Client Accounts Pursuant to the Program" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts pursuant to the Trading Program.

(3) "Number of Open Client Accounts" is the number of client accounts directed by the Advisor pursuant to the Trading Program as of the date shown.

(4) "Total Client Assets Under Management - Nominal" is the aggregate amount of client's assets (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading program as the date shown computed on a accrual basis in accordance with Generally Accepted Accounting Practices.

- (5) "Total Assets Traded Pursuant to the Program Nominal" is the amount of client (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading Program as of the date shown, computed on an accrual basis in accordance with Generally Accepted Accounting Principles.
- (6) "Draw-down" means losses experienced by the Trading Program over a specified period expressed as a percentage of beginning net asset value.
- (7) "Largest Monthly Draw-down on an Composite Account Basis" is the largest monthly loss experienced by any composite account traded pursuant to the Trading Program in any calendar month expressed as a percentage of beginning net asset value and includes the month and year of such draw-down.
- (8) "Largest Peak-to-Valley Draw-down on an Composite Account Basis" is the largest cumulative percentage decline in month-end net asset value of any composite account traded pursuant to the Trading Program due to losses sustained by such account during a period in which the initial month-end net asset value of the account is not equaled or exceeded by a subsequent month-end net asset value and includes the time period in which such draw-down occurred.
- (9) "Number of Closed Client Accounts" is the number of client accounts traded pursuant to the Trading Program that were closed as of the date shown, either profitably or unprofitably, as indicated.
- (10) "Monthly Rate of Return" represents net performance for a month divided by beginning Net Asset Value, time weighted for any additions or withdrawals occurring during the month.
- (11) "Annual Rate of Return" represents the cumulative compounded rate of return for each year or portion thereof. It is computed by applying successively the respective monthly rates of return for each month beginning with the first month presented in each period and represents the net percentage change since the beginning of the period presented.
- (12) "NT" represents No Trading occurred within the specified month

### PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

#### Capsule F – Discretionary Flex <u>Trading Program</u> Client Account Performance (Unaudited)

#### Interest Earned by the Client is Not Included in the Table

Name of CTA:		Mobius Asset
	Management, Inc.	
Name of CTA's Trading Program:	_	Discretionary FlexTrading
	Program	
Inception of Trading Client Accounts by CTA:		January, 1996
Inception of Trading Client Accounts Pursuant to the Program:		February2014
Number of Open Client Accounts:		0
Total Client Assets Under Management – Nominal:		\$1,064,813
Total Assets Traded Pursuant to the Program - Nominal:		\$0
Largest Monthly Draw-down on a Composite Account Basis:		-4.56% Feb 2014
Largest Peak-to-Valley Draw-down on a Composite Account Basis:		-32.35 Feb 14 – Apr 16
Number of Profitable Opened and Closed Client Accounts:		0 Range:
Number of Unprofitable Opened and Closed Client Accounts:		21 Range: -0.46% - 47.47%

Month	2019	2018	2017	2016	2015	2014
January	NT	NT	NT	-0.29%	-0.003%	NT
February	NT	NT	NT	-0.39%	-2.64%	-4.56%
March	NT	NT	NT	-0.83%	-1.02%	-2.98%
April		NT	NT	-0.98%	-2.59%	-1.68%
May		NT	NT	NT	-1.70%	-2.04%
June		NT	NT	NT	-2.38%	0.49%
July		NT	NT	NT	-1.02%	-2.11%
August		NT	NT	NT	-0.13%	-1.52%
September		NT	NT	NT	-1.46%	0.62%
October		NT	NT	NT	-1.11%	-4.08%
November		NT	NT	NT	-0.87%	-1.43%
December		NT	NT	NT	-0.45%	-1.45%
Annual Rate of Return	NT	NT	0.00%	-2.46%	-14.37%	-19.01%

The Mobius Discretionary Flex Trading Program ceased trading in April 2016 and is no longer being offered by the Advisor.

### THE NOTES TO PERFORMANCE CAPSULE F ON THE NEXT PAGE ARE AN INTEGRAL PART OF THIS PERFORMANCE RECORD.

#### NOTES TO PERFORMANCE CAPSULE F

A summary of significant accounting policies, which have been followed in preparing the accompanying Capsule E, is set forth below. All performance has been prepared on an accrual basis in accordance with Generally Accepted Accounting Principles.

- (1) "Inception of Trading Client Accounts by CTA" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts.
- (2) "Inception of Trading Client Accounts Pursuant to the Program" is the date on which the Advisor, as successor to John McLane's sole proprietorship CTA, began trading client accounts pursuant to the Trading Program.

(3) "Number of Open Client Accounts" is the number of client accounts directed by the Advisor pursuant to the Trading Program as of the date shown.

(4) "Total Client Assets Under Management - Nominal" is the aggregate amount of client's assets (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading program as the date shown computed on a accrual basis in accordance with Generally Accepted Accounting Practices.

- (5) "Total Assets Traded Pursuant to the Program Nominal" is the amount of client (including committed funds and nominal funds) under management with the Advisor pursuant to the Trading Program as of the date shown, computed on an accrual basis in accordance with Generally Accepted Accounting Principles.
- (6) "Draw-down" means losses experienced by the Trading Program over a specified period expressed as a percentage of beginning net asset value.
- (7) "Largest Monthly Draw-down on an Composite Account Basis" is the largest monthly loss experienced by any composite account traded pursuant to the Trading Program in any calendar month expressed as a percentage of beginning net asset value and includes the month and year of such draw-down.
- (8) "Largest Peak-to-Valley Draw-down on an Composite Account Basis" is the largest cumulative percentage decline in month-end net asset value of any composite account traded pursuant to the Trading Program due to losses sustained by such account during a period in which the initial month-end net asset value of the account is not equaled or exceeded by a subsequent month-end net asset value and includes the time period in which such draw-down occurred.
- (9) "Number of Closed Client Accounts" is the number of client accounts traded pursuant to the Trading Program that were closed as of the date shown, either profitably or unprofitably, as indicated.
- (10) "Monthly Rate of Return" represents net performance for a month divided by beginning Net Asset Value, time weighted for any additions or withdrawals occurring during the month.
- (11) "Annual Rate of Return" represents the cumulative compounded rate of return for each year or portion thereof. It is computed by applying successively the respective monthly rates of return for each month beginning with the first month presented in each period and represents the net percentage change since the beginning of the period presented.
- (12) "NT" represents No Trading occurred within the specified month