

# ROBOT FUTURES, LLC

A Florida Limited Liability Company

The date of this Disclosure Documents is June 1, 2019

This disclosure document of ROBOT FUTURES, LLC is required pursuant to CFTC Regulation 4.21(a) (the "Disclosure Document"). The Disclosure Document must be read in its entirety by prospective Clients. Any additional Information is available from ROBOT FUTURES, LLC upon request in writing ROBOT FUTURES, LLC, 1343 Main Street, Suite 704, Sarasota, FL 34236 or by calling (941) 260-3333. This Disclosure Document is not to be distributed under any circumstances after March 1, 2020 and will be superseded after that date by a Disclosure Document containing then current information about this program.

## ***Private and Confidential***

---

**PURSUANT TO AN EXEMPTION FROM THE COMMODITY FUTURES TRADING COMMISSION IN CONNECTION WITH ACCOUNTS OF QUALIFIED ELIGIBLE PERSONS, THIS BROCHURE OR ACCOUNT DOCUMENT IS NOT REQUIRED TO BE, AND HAS NOT BEEN, FILED WITH THE COMMISSION. THE COMMODITY FUTURES TRADING COMMISSION DOES NOT PASS UPON THE MERITS OF PARTICIPATING IN A TRADING PROGRAM OR UPON THE ADEQUACY OR ACCURACY OF COMMODITY TRADING ADVISOR DISCLOSURE. CONSEQUENTLY, THE COMMODITY FUTURES TRADING COMMISSION HAS NOT REVIEWED OR APPROVED THIS TRADING PROGRAM OR THIS BROCHURE OR ACCOUNT DOCUMENT.**

**ROBOT FUTURES, LLC DOES NOT AUTHORIZE ANY PERSON TO GIVE ANY INFORMATION OR TO MAKE ANY REPRESENTATIONS NOT CONTAINED HEREIN.**

**INFORMATION CONTAINED HEREIN IS CORRECT AS OF THE DATE OF THIS DOCUMENT.**

**THE DELIVERY OF THIS DISCLOSURE DOCUMENT DOES NOT IMPLY THAT THE INFORMATION IT CONTAINS IS CORRECT SUBSEQUENT TO THE DATE SHOWN BELOW.**

## **RISK DISCLOSURE STATEMENT**

**THE RISK OF LOSS IN TRADING COMMODITIES 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 FUTURE OR SELL A COMMODITY OPTION, YOU MAY SUSTAIN A TOTAL LOSS OF THE INITIAL MARGIN FUNDS 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 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 14, 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 MARKETS. YOU SHOULD THEREFORE CAREFULLY STUDY THIS DISCLOSURE DOCUMENT AND COMMODITY TRADING BEFORE YOU TRADE, INCLUDING THE DESCRIPTION OF THE PRINCIPAL RISK FACTORS OF THIS INVESTMENT, AT PAGE 10.**

**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.**

---

TABLE OF CONTENTS

---

Risk Disclosure Statement.....2

Table of Contents.....3

Summary.....4

Introduction.....6

The Advisor.....6

Investment Methodology.....8

Principal Risk Factor .....10

Conflicts of Interest.....13

Fees of the Advisor.....14

Brokerage Arrangements.....15

Opening an Account.....15

Addition and Withdrawal Requirements.....16

Additional Information.....16

Privacy Statement.....17

---

## SUMMARY

---

The following summary briefly describes the offering of Interests in ROBOT FUTURES, LLC and is qualified in its entirety by the detailed information appearing elsewhere in this Disclosure Document.

**The Company:** ROBOT FUTURES, LLC (the “Company”, “ROBOT” or the “Advisor”) is a Florida Limited Liability Company organized in January 2007. The Company was founded SKYBOX Trading, LLC and changed its name to ROBOT FUTURES, LLC in September 2011. The Company's principal office is at 1343 Main Street, Suite 704, Sarasota, FL 34236; its telephone number is (941) 260-3333. The books and records will be kept at the aforementioned address.

**Company Mission:** The ROBOT philosophies of strategy architecture, risk management and portfolio integration are synergistic. We believe first and foremost that any great methodology should excel not only on its own but also offer quantifiable benefit to each other via an expertly constructed portfolio. Each of the ROBOT strategies has been designed from the ground up with the thought of such integration in mind. Many quantitative trading firms simply curve fit a single strategy to a narrow range of recent market conditions using parameter optimization. While this method can produce impressive short-term returns, the very nature of the auction process in all markets has proven again and again its propensity to eventually identify and eliminate such inefficiencies.

Instead of fragile and often fleeting inefficiencies, ROBOT has chosen to construct its portfolio around a solid foundation of relatively simple investment strategies universally accepted for centuries by clients and advisors alike. Where many absolute return programs end and ROBOT begins is in our commitment to integration. Our strategies were not only designed to integrate with each other into a complete absolute return solution, but that solution is flexible enough to be custom integrated into the overall portfolio as well.

Above all, risk management is our primary focus. Simply stated, we expend far more effort learning to minimize losing periods than we do on maximizing winning ones. In our view, high returns are only impressive if they are markedly consistent across the time horizon for investment and if coupled with equally impressive drawdown mitigation during the inevitable difficult periods encountered by any strategy. That ROBOT continues to achieve this goal is a testament to our passion and continued commitment to all that we do. See “**RISK FACTORS**”.

**Fees and Expenses:**      Management Fee: At the beginning of each calendar month, the Company will be paid a monthly management fee equal to 1/12 of 2% (approximately 2.0% annually) of the Client’s Net Asset Value of each Client's Segregated Account (as hereinafter defined) (the “Management Fee”). For the purpose of calculating the management fee, the Net Asset Value of a Client's Segregated Account is determined before reduction for Management Fees and Performance Fees, if any, accrued or payable as of such date.

Performance Fee: At the beginning of each calendar month, the Company will be paid an incentive fee equal to 20% of the change in the Client’s Net Asset Value of each Client's Segregated Account. For the purpose of calculating the performance fee, the Net Asset Value of a Client's Segregated Account is determined before reduction for Management Fees and Performance Fees, if any, accrued or payable as of such date.

Expenses. The Client, as it relates to their segregated account, is obligated to pay transaction expenses.

**Withdrawals:** All or a portion of such investment may be withdrawn upon five (5) day written/email notice to the Company.

**Risk Factors:** The investment programs of the Company involve significant risks. The Company is a recently formed entity in a high-risk field, and there is limited operating history upon which to evaluate its likely performance. There is no present expectation that a secondary market in the Interests will develop, and there are restrictions on transfers of Interests. Substantial risks are involved in investing in and trading in the commodities. In addition,

investments in options may be subject to greater fluctuation than investments in the underlying instruments and the low margin deposits normally required in futures trading permit an extremely high degree of leverage. Accordingly, a relative small price movement in a commodity futures contract may result in immediate and substantial profits or losses. ROBOT intends to utilize leverage in investing the Client's assets. While this use of leverage may increase the Client's overall rate of return, it also may increase losses incurred by the Client and the volatility of the Client's returns. See "**RISK FACTORS.**"

**Conflicts of Interests:** Certain inherent and potential conflicts of interests exist in the nature and operations of the Company. See "**CONFLICTS OF INTEREST.**"

**Additional Information:** Prospective clients desiring further information concerning the terms and conditions of this offering of services should contact ROBOT FUTURES, LLC at 1343 Main Street, Suite 704, Sarasota, FL 34236. Telephone inquiries may be directed to Robert J. Ogilvie at (941) 260-3333.

---

## INTRODUCTION

---

ROBOT FUTURES, LLC (“advisor”), place of business is located at 1343 Main Street, Suite 704, Sarasota, FL 34236. The telephone number is (941) 260-3333. All books and records pertaining to the business of the advisor will be maintained at the above address. The advisor intends to use this document as of December 1, 2016.

---

## THE ADVISOR

---

ROBOT FUTURES is a Florida Limited Liability Company established in January 2007. In August of 2007, ROBOT FUTURES was registered with the CFTC as a Commodity Trading Advisor and has also been a member of the National Futures Association as of the same date. Robert J. Ogilvie (“Mr. Ogilvie”) is a principal, Chief Strategist, and Risk Manager of ROBOT. Mr. Ogilvie supervises all the Company’s investment and administrative functions. James P. Roemer (“Mr. Roemer”) is an Associated Person (AP), Chief Analyst, and Portfolio Manager of ROBOT.

### **Robert J. Ogilvie, Chief Strategist & Risk Manager**

#### **Recent Business Background:**

ROBOT FUTURES, LLC - Principal/Chief Strategist/Risk Manager, 09/11 - Present

SKYBOX FINANCIAL GROUP - (Formerly GP Wealth Management) Principal/Portfolio Manager 01/08 – 06/09

SKYBOX Trading, LLC - Principal/Chief Strategist/Risk Manager, 01/07 – 09/11

thinkorswim Group, Inc – Institutional Broker/Registered Principal, 04/05 – 11/09

Coastal Capital Management, LLC - Owner/CIO/Portfolio Manager, 08/04 - 12/06

Decision Capital Management, LLC - Portfolio Manager, 04/03 - 10/04

#### **Education**

University of Central Florida (Orlando, FL) - B.S. Finance, 1997

Robert J. Ogilvie is a principal and the chief strategist for ROBOT FUTURES. Mr. Ogilvie has over 20 years of trading experience stemming from his belief in non-conventional methods of trading characterized by his effective use of market volatility, unique non-correlated strategies and systematic trade selection and exit techniques. His ability to blend systems, techniques, and strategies to create a proprietary methodology allows for the best risk to reward potential.

Prior to founding ROBOT in January 2007, Mr. Ogilvie founded Coastal Capital Management, a Florida RIA and the General Partner to a Multi-Strategy Fund and an Income Fund. As the Chief Investment Officer (CIO), Mr. Ogilvie gained institutional trading and capital management experience while also serving as the portfolio and risk manager of the funds under management. In addition to serving as the (CIO), Mr. Ogilvie created multiple investment strategies utilizing equities, debt instruments, commodities and foreign currency. Furthermore, he served as the funds Risk Manager which included loss management, profit capture and strategy allocation.

From 1998 - 2003 and 2008 - 2010, Mr. Ogilvie had been a recommended Financial Advisor and author for OptionInvestor.com. Between 2005 and 2009, Mr. Ogilvie was an institutional broker and registered principal with thinkorswim, Inc. where he also provided continuous market commentary for REDoption, thinkorswim Group’s proprietary advisory division. While attending the University of Central Florida, where he majored in finance, Mr. Ogilvie was first introduced to option pricing theories, portfolio analysis and portfolio modeling. A combination of education, portfolio modeling experience, and the knowledge attained from managing client options accounts provided the basis on which many proprietary trading strategies are developed.

Intentionally Left Blank

---

## INVESTMENT METHODOLOGY

---

***All investment decisions will be made exclusively by ROBOT, in its sole and absolute discretion. ROBOT will be free to pursue such investment strategies, as it deems fit or appropriate at any given time. The following discussion of investment strategy is intended only to provide an overview of potential strategies which may be used by the Company, but which are subject to change as market conditions may warrant.***

### **Objective and General Approach**

Our trading philosophy is based upon figuratively laying out various technical, fundamental and sentiment indicators on the playing field where we can observe the game and more effectively call plays to be more defensive or offensive. Most trading systems rely on a group of technical indicators as a basis for the trade signal without regard to market fundamentals or sentiment. While each of our programs relies heavily on a different type of indicator, defining posture first develops proper trade structures that lead to more consistent profits.

### **VEGA PORTFOLIO – Robert J. Ogilvie, Portfolio Managers**

The VEGA Portfolio Program (VP) is designed for investors seeking portfolio allocation to the non-correlated alternative markets without succumbing to the wide return variance and peak drawdown exposure typically seen in many absolute return programs.

The VP program was constructed with risk management as the primary objective and is designed with a goal of reducing return volatility while targeting high risk-adjusted returns. The strategy's inherent mechanical nature utilizes dynamic measurements to develop volatility adjusted trade and risk management models.

The VP program executes trades in the Gold, Copper, Crude Oil, Natural Gas, EURO FX Currency, Japanese Yen FX, S&P 500 Index, and US Treasury Bond futures markets utilizing long and short strategies at expansion and contraction points in volatility. A multitude of strategy parameters for entry and exit signals are automatically executed according to pre-defined parameters without user intervention removing human emotions that may hinder the consistency and returns of the strategy.

The program was constructed with risk mitigation as the primary objective and above average risk adjusted returns as the secondary objective. The program seeks its primary objective by utilizing our proprietary risk management model. While the risk management model is not infallible, each strategy trade is established with fixed risk and followed up with trailing stops, therefore allowing the strategy to target a profit multiple greater than 1:1. Utilizing these risk and targeting models successfully aids the program in achieving nearly zero standard deviation of monthly returns which aids the program in achieving both primary and secondary objectives.

### **S&P MULTI-STRATEGY – Robert J. Ogilvie, Portfolio Manager**

The MULTI-STRATEGY program is designed for traditional investors seeking portfolio allocation to the alternative space without the wide return variance and peak drawdown exposure typically seen in absolute return programs. The program executes trades exclusively in the S&P 500 index futures market utilizing multiple long/short models non-correlated by both methodology and interval.

The MULTI-STRATEGY program executes a long only strategy, with trades lasting multiple days or weeks, utilizing a proprietary trend following methodology that executes when specific criteria are met. The program is also comprised with an intermediate term, often multiple days, strategy utilizing a unique method of analyzing investor sentiment and then executes long and short at expansion and contraction points in sentiment, respectively. The program utilizes various short term (intraday strategies) that are comprised of a unique set of mechanical models where maximum daily and monthly risk is finite and can be tailored to meet specific maximum or minimum draw down profiles. When conditions are met, the short-term systems execute during regular NYSE market hours while the intermediate term strategy executes around the NYSE market close. Most of the short-term positions are flat ahead of the underlying cash market close minimizing the majority of overnight price shock risk to capital.

The program was constructed with risk mitigation as the primary objective and above average risk adjusted returns as the secondary objective. The program seeks its primary objective by utilizing our proprietary fixed return targeting model which is designed to further mitigate risk from adverse price movements late in the return cycle.

The fixed targeting model's objective is to achieve return expectations in the shortest time possible for the period and exit all positions, therefore eliminating further market risk from the portfolio. While the fixed targeting model is not infallible, each period the fixed targeting model is successful aids the program in achieving nearly zero standard deviation of monthly returns which aids the program in achieving both primary and secondary objectives.

---

## PRINCIPAL RISK FACTORS

---

The foregoing list of Principal Risk Factors does not purport to be a complete explanation of the risks involved in option trading. Potential investors should read the entire disclosure document before deciding whether to invest in the program. Commodity interest trading is a high risk investment which should be made only after consultation with independent qualified sources of investment and tax advice. Among the risks involved are the following:

### *Commodity Trading Is Volatile*

A principal risk in commodity interest trading is the traditional volatility (or rapid fluctuation) in the market prices of commodities. The volatility of commodity trading may cause a client's account to lose all or a substantial amount of its assets in a short period of time. Prices of commodity interests are affected by a wide variety of complex and hard to predict factors, such as political and economic events, weather and climate conditions and the prevailing psychological characteristics of the marketplace.

### *Substantial Leverage*

Commodity futures contracts are traded on margins which typically range from about 2% to 20% of the value of the contract. Low margin provides a large amount of leverage, i.e., commodity futures contracts for a large number of units (bushels, pounds, etc.) of a commodity, having a value substantially greater than the margin, may be traded for a relatively small amount of money. Hence a relatively small change in the market price of a commodity can produce a corresponding large profit or loss. If the Advisor invested a substantial portion of the assets of a client's account in such a situation, a substantial change, up or down, in the value of the account would result. For example, if at the time of purchase 5% of the price of a futures contract is deposited as margin, a 5% decrease in the price of the futures contract would, if the contract were then closed out, result in a total loss of the margin deposit. Brokerage commissions and other expenses also would be incurred and would have to be paid despite the loss. Thus, like other leveraged investments, any trade may result in losses in excess of the amount invested.

### *Commodity Trading May be Illiquid*

It is not always possible to execute a buy or sell order at the desired price, or to close out an open position due to market conditions and/or price fluctuations. As an example of this latter risk, it should be noted that when the market price of a commodity futures contract reaches its daily price fluctuation limit no trades or only a limited number of trades can be executed. Daily price fluctuation limits are established by the exchanges and approved by the Commodity Futures Trading Commission ("CFTC"). The holder of a commodity futures contract may therefore be locked into an adverse price movement for several days or more and lose considerably more than the initial margin paid to establish a position. In certain commodities, the daily price fluctuation limits may apply throughout the life of the contract, and hence the holder of a futures contract who cannot liquidate his position by the end of trading on the last trading day may be required to make or take delivery of the commodity. Another instance of difficult or impossible execution occurs in thinly traded markets or markets which lack sufficient trading liquidity. As a result, no assurance can be given that the Advisor's orders will be executed at or near the desired price.

### *Limited Portfolio May Result in Increased Volatility*

Trading a limited portfolio may result in Clients experiencing greater performance volatility and greater risk of loss than would be experienced by a more diversified portfolio.

### *No Intrinsic Value to Investments*

The program offered should be considered on a stand-alone basis only, not as a beneficial diversification to a portfolio, unless it trades successfully. Clients will not acquire assets with intrinsic value. The program offered hereby is entirely speculative and is not based on the appreciation in value of any asset.

### *Possible Regulatory Changes*

In the current environment, prospective Clients must recognize the possibility of future regulatory changes altering, perhaps to a material extent, the nature of an investment in the program offered hereby. For example, certain exchanges could raise significantly the margin requirements applicable in connection with ROBOT strategies. Accordingly, ROBOT would not be able to trade as many contracts, based on a particular level of Net Assets, as was possible previously. Reduced position levels may lead to lower profit potential.

### *Tax liability*

Clients should satisfy themselves as to the income tax and other tax consequences of an investment in a managed account program with specific reference to their own tax situation by obtaining advice from their own tax counsel before participating in a managed account program.

### *Trading on Commodity Exchanges Outside the United States*

Although the Advisor currently does not intend to do so, it may in the future engage in trading on commodity exchanges outside the United States on behalf of Clients. Trading on such exchanges is not regulated by any United States governmental agency and may involve certain risks not applicable to trading on United States exchanges. Clients, or their FCM on their behalf, would deposit foreign currency margin in respect of such trading, and would, accordingly, incur certain exchange-rate risk, as well as perhaps earning reduced or no interest income on such deposits.

### *Clients Personally Liable for Losses in Their Accounts*

In a managed account, as opposed to a limited liability investment such as a commodity pool, a client's liability for losses in the account is a direct personal liability of the client. A client's potential loss is by no means limited to the amount of assets which he commits to the account. For example, in a market in which the Advisor is unable to liquidate positions, clients could lose well in excess of the maximum they had thought they were risking in their futures trading.

### *Concentration of Positions*

The Advisor may concentrate its trading in certain types of commodity interests. Consequently, a client may not maintain a variety of diverse positions. Concentration of trading in certain types of commodity interests may subject the account's performance to relatively greater volatility than if the account was more diversified.

### *Reliance on Trading Method Employed by Advisor*

The Advisor primarily bases its trading decisions on "technical" factors, such as past price fluctuations of the group or type of commodity. See "Trading Program."

Technical analysis is based on the theory that the study of the markets themselves provides a means of anticipating price movements. Consequently, such analysis does not focus on the forces directly affecting the markets. The technical factors that can be evaluated by an Advisor are limited in that they must be quantifiable in order to be processed by the Advisor. Technical trading methods may also be unsuccessful both because the market models employed are not in fact reliable indicators of future price trends and because the markets are from time to time dominated by fundamental factors. Any factor which may lessen major price trends (such as governmental controls affecting the markets) may reduce the prospect for future trading profitability. Any factor which would make it difficult to execute trades, such as reduced liquidity or extreme market developments resulting in limit moves, could also be detrimental to profits.

In short, no assurance can be given that the Advisor's trading techniques and strategies will be profitable. The best trading strategy will not be profitable if there are no fundamental or technical indicators of the kind it seeks to follow.

### *Counterparty Credit Risk*

The Advisor may trade a client account in the over-the-counter foreign exchange and financial instrument markets. These markets do not have the safeguard mechanisms of a clearing organization 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 fulfill its contract. Failure by a counterparty to fulfill its contractual obligations could expose the client to unanticipated losses.

### *The Futures Broker Could Fail*

The Commodity Exchange Act generally requires a futures broker to segregate all funds received from customers from such broker's proprietary assets. If the broker fails to do so, a client's assets might not be fully protected in the event of the bankruptcy of the futures broker. Furthermore, in the event of the futures broker's bankruptcy, you could lose the entire amount, or be limited to recovering only a *pro rata* share, of all available funds segregated on behalf of the futures broker's combined customer accounts, even though certain property specifically traceable to you (for example, Treasury bills deposited with the futures broker as margin) was held by the futures broker. Furthermore, dealers in forward and option contracts are not regulated by the Commodity Exchange Act and are not obligated to segregate customer assets. As a result, you do not have such basic protection in forward and options contracts.

### *Commencement of Trading*

An account managed by the Advisor will encounter a start-up period during which it will incur certain risks relating to the initial investment of its assets. An account may commence trading operations at an unpropitious time, such as shortly before a period during which markets have few or no price trends. Moreover, the level of diversification may be lower during the start-up period than in later periods characterized by the commitment of a greater percentage of assets to trading in certain commodity interests. No assurance can be given that the approach which the Advisor chooses to adopt as a means of moving toward full portfolio commitment will be successful or will not result in substantial losses which might have been avoided by other means of initiating such trading in commodity interests.

THE FOREGOING LIST OF RISK FACTORS DOES NOT PURPORT TO BE A COMPLETE EXPLANATION OF THE RISKS INVOLVED IN COMMODITY TRADING. POTENTIAL INVESTORS SHOULD READ THE ENTIRE DISCLOSURE DOCUMENT AND CONSULT WITH THEIR OWN FINANCIAL AND TAX ADVISORS BEFORE DECIDING TO INVEST.

### *SPECIAL DISCLOSURE FOR NOTIONALLY-FUNDED ACCOUNTS*

Some accounts managed by the Advisor may specify a Nominal Account size that exceeds the amount of Actual Funds and are therefore referred to as "Notional Fund Accounts". The amount by which the Nominal Account size exceeds the amount of Actual Funds on deposit in an account is deemed "Notional Funds".

You should request your commodity trading 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 commodity trading advisor will determine the number of contracts traded in your account and should be an amount sufficient to make it unlikely that any further cash deposits would be required from you over the course of your participation in the commodity trading advisor's program.

You are reminded that the account size you have agreed to in writing (the "nominal" or "notional" account size) is not the maximum possible loss that your account may experience. You should consult the account statements received from your Futures Commission Merchant in order to determine the actual 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, measured in dollars will be the same, they will be greater when it expresses a percentage of account equity.

2. You may receive more frequent and larger margin calls.
3. You will pay higher advisory fees and brokerage commissions, as measured by the percentage of such fees and commissions in relation to assets actually deposited in the account, than a client's account which is fully funded.
4. Once the initial nominal account size has been established by the client in writing, it will continue to be increased/decreased by cash additions, cash withdrawals, and net performance. A change in the nominal account size (trading level) should be communicated to the advisor in writing. A client can specifically request in writing that cash additions, cash withdrawals, and net performance not impact the nominal account size.

---

## CONFLICTS OF INTEREST

---

An investment in an account managed by the Advisor involves risks due in part to certain inherent or potential conflicts of interests. Among such conflicts are the following:

### *Commissions*

The Advisor may receive a portion of brokerage commissions, up to 100%, on any account. This could be viewed as an incentive to overtrade the Account.

### *Proprietary Trading of the Advisor*

The Advisor and its principal may trade, or will continue to trade, for its own proprietary accounts; such trading may be extensive. There is a conflict of interest between their interest in trading client accounts in order to maximize trading profits for clients and their interest in trading the proprietary accounts in order to maximize trading profits for such accounts. A potential conflict of interest may occur when the Advisor and its principal as a result of a neutral allocation system, testing a new trading system, trading their proprietary accounts more aggressively or any other actions that would not constitute a violation of fiduciary duties, take positions in the proprietary accounts which are opposite, or ahead of, the positions taken for a client. The advisor may also participate in block orders and it may be possible for the Advisor to receive a partial fill on such orders.

### *Management of Other Accounts by the Advisor and its Principal*

The Advisor and its principal may advise other commodity trading accounts, including commodity pools. These accounts may be traded according to the same trading method described herein. Positions held by all client accounts, as well as the proprietary accounts of the Advisor and its principal, will be aggregated for the purpose of applying the speculative position limits. If these limits were approached or reached by trading directed by the Advisor and its principal for their proprietary accounts or other client accounts, an account might be unable to enter or hold certain positions. Such other accounts managed by the Advisor could also compete with an account for the execution of the same trades. Because of the price volatility, variations in liquidity from time to time, and differences in order execution, it is impossible for the Advisor to obtain identical trade executions for all its clients. In addition, certain clients of the Advisor may pay fees to the Advisor, which are higher than that which the Advisor will receive from other clients. As a result, the Advisor will have a conflict of interest between its interest in treating all client accounts alike and its interest in favoring certain clients over others because such clients may pay more in fees to the Advisor. In rendering trading advice to a client, the Advisor and its principal will not knowingly or deliberately favor any other account over the account of a client. No assurance is given that the performance of all accounts managed by the Advisor and its principal will be identical or even similar.

---

## FEES OF THE ADVISOR

---

The Client will pay the Advisor an incentive fee of 20% (paid monthly) based on trading profits. The Client will also pay a monthly management fee of 0.1667% (2% annually). These fees are negotiable and may vary depending upon account size and other factors. There will be a maximum commission charge of \$12.50 per round-turn per contract. These commissions include all Exchange and NFA fees. The Advisor may receive a portion of brokerage commissions, up to 100%, on any account.

The Trading Advisor will receive a monthly incentive fee based on Trading Profits. Trading Profits for purposes of calculating the Trading Advisor's incentive fees during a period shall mean the cumulative profits (over and above the aggregate of previous period profits as of the end of any period) during the period (after deduction for brokerage fees paid and the Trading Advisor's management fee but before deducting the Trading Advisor's incentive fees payable). Trading Profits shall include both realized and unrealized profits. Trading Profits shall include interest received by the Client on its assets (either interest earned by T-Bills held in the clients' accounts or interest earned on funds in the clients carrying broker account which are in excess of the applicable margin requirements). If Trading Profits for a period are negative, it shall constitute a "Carryforward Loss" for the beginning of the next period. To the extent any funds are withdrawn from a Client's account, any loss attributed to those funds shall be deducted from the Carryforward Loss. No incentive fees shall be payable until future Trading Profits for the ensuing periods exceed the Carryforward Loss.

The Trading Advisor may charge a management fee, which will be paid monthly, based on Account Equity as of the end of business on the last day of each month. Account equity shall mean an account's total assets, including all cash and cash equivalents, accrued interest and the market value of all open positions maintained in the account, plus any amount the Client has informed the Trading Advisor of that has been committed to trading in the account, less total liabilities of the account except the management and incentive fees payable to the Trading Advisor, and shall be determined in accordance with generally accepted accounting principles, consistently applied. Any additions or withdrawals during the month will be pro-rated and charged the appropriate management fee. All management fees will be based on the appropriate "nominal" account size, which is the designated account size for trading purposes and may include funds other than those held in the trading account.

Management and incentive fees will accrue monthly and be billed monthly. Fees which have been paid will not be returned in the event of losses in subsequent periods. All fees will be deducted directly from a Client's account with its Futures Commission Merchant.

In the course of its investment activities the Client will incur transaction expenses. ROBOT and its principals may benefit directly or indirectly from a clients choice of any particular Futures Commission Merchant and/or Introducing Broker. Some FCM's may also elect to pay ROBOT interest on customer balances. In addition to the regular commission rates, accounts held at any FCM may also be charged "give-ups", desk fees, technology fees or other order execution fees which are paid to brokers and/or ROBOT for the execution of the customer's order. The maximum commission charge for such services will not exceed fifteen (\$15.00) per round-turn per contract. These commissions include all Exchange and NFA fees. ROBOT may at times pay a portion of collected fees to third parties, such as Introducing Brokers (IBs), CTAs or CPOs that are properly registered with the NFA, for referral services.

### **Additional Fees**

In order to provide for more efficient execution of orders for the account, ROBOT may place orders for execution through one broker, which will later be given-up by the executing broker to the client's FCM. Give-up trades may be floor trades or even electronic platform trades. When signing the Investment Management Agreement attached hereto, the client agrees to pay all give-up fees. Give-up transaction fees will customarily range between approximately one dollar (\$1.00) and five dollars (\$5.00) per round-turn per contract.

## **Miscellaneous**

Management and Incentive fees, if any, are due immediately upon termination of a client account prior to the end of the month. A participating customer is not entitled to a refund of any management fees and/or incentive fees paid to the date of such customer's withdrawal from the Managed Account Program.

Following the end of a calendar month, an invoice will be sent to the FCM carrying the participating customer's account to collect the management fee and incentive fee, if any, that are due and owing to the Advisor. By signing the Fee Payment Authorization, participating clients authorize their respective FCM to pay the Advisor management and incentive fees from the customer's account upon the receipt of a bill for such fees from the Advisor. The Advisor should be contacted as soon as possible upon finding any errors.

---

## **BROKERAGE ARRANGEMENTS**

---

### **Transactional Firm**

Clients must select an FCM at which their accounts are maintained and through which trades will be executed. Clients may select the FCM of their choice, and are free to also choose a separate IB, if they prefer to have one. Each client will receive confirmations and monthly account statements from its FCM reflecting all transactions entered into on its behalf by ROBOT. These records should be reviewed immediately upon receipt in order to monitor the status of the account managed by the Advisor, and should be retained for future reference.

### **General Selection Criteria**

In the event the client does not select an FCM, ROBOT will have complete discretion in deciding what Futures Commission Merchant ("FCM") to use and in negotiating rates of compensation. In choosing an FCM or Introducing Broker, ROBOT will not be required to consider any particular criteria. For the most part, ROBOT will seek the best combination of expenses and execution quality but, as discussed below, ROBOT is not required to select the FCM or Introducing Broker that charges the lowest transaction cost, even if that FCM provides execution quality comparable to other FCMs or Introducing Brokers. In evaluating "execution quality" historical net prices on other transactions will be a principal factor, but other factors will also be relevant.

### **Litigation**

There have been no material civil, administrative, or criminal action concluded, pending or on appeal against the Company, ROBOT or its Principals during the five years preceding the date of this Disclosure Document.

---

## **OPENING AN ACCOUNT**

---

Each client must read, sign and return to the Advisor the Advisor's Commodity Advisory Agreement and the Fee Payment Authorization. The client may also sign and return to the Advisor the Arbitration Agreement, although the client is not required to sign such agreement in order to retain the services of the Advisor. The client must complete the standard package of customer account agreements of its commodity broker.

The minimum initial investment for an account managed by the Advisor is recommended to be at least \$100,000, although the Advisor may, in certain circumstances, agree to manage a smaller amount. The Advisor strongly recommends that its clients view a managed futures trading program as a long-term investment and, accordingly, should not withdraw capital for at least one year. It should also be noted that due to the positions held and the markets traded by the Advisor, it may take up to 24-48 hours for all of the client's positions to be liquidated by the Advisor after the Advisor has been instructed, in writing/email, to close the account.

---

## ADDITION AND WITHDRAWAL REQUIREMENTS

---

Additional funds may be added to a Client's existing account at any time with written/email notice to the Advisor. Clients must provide written/email notice to the Advisor five (5) business days in advance in order to withdraw funds in any amount from their account. All notices of additions and withdrawals will become effective once acknowledged by the Advisor. Changes to positions held by an account will be made as promptly as possible subsequent to the acknowledgment of the request. The Advisor reserves the right to negotiate addition and withdrawal requirements on an individual account basis.

---

## ADDITIONAL INFORMATION

---

Additional information about the Advisor is available from it upon request. Inquiries should be directed to Robert J. Ogilvie, the principal of the Advisor, at 1343 Main Street, Suite 704, Sarasota, FL 34236. His telephone number is (941) 260-3333. Clients should also consult with their personal tax or financial advisors to obtain an understanding of the impact of trading commodity interests on their tax and financial situations.

## PRIVACY STATEMENT

Pursuant to the Commodity Futures Trading Commissions new rules, financial institutions like ROBOT FUTURES are required to provide privacy notices to their clients. We at ROBOT FUTURES consider privacy to be fundamental to our relationship with our clients. We are committed to maintaining the confidentiality, integrity and security of our current and former clients' non-public information. Accordingly, we have developed internal polices to protect confidentiality while allowing clients' needs to be met.

We will not disclose any non-public personal information about clients, except to our affiliates and service providers as allowed by applicable law or regulation. In the normal course of serving our clients, information we collect may be shared with companies that perform various services such as our accountants, auditors and attorneys. Specifically, we may disclose these service providers nonpublic personal information including:

- Information ROBOT FUTURES receives from clients on managed account agreements and related forms (such as name, address, Social Security/Tax identification number, birth date, assets, income and investment experience); and
- Information about clients' transactions with ROBOT FUTURES (such as account activity and account balances).

Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose. To protect the personal information of individuals, we permit access only by authorized employees who need access to that information to provide services to our clients and us. In order to guard clients' non-public personal information, we maintain physical, electronic and procedural safeguards that comply with the U.S. federal standards. If the relationship between a client and ROBOT FUTURES ends, ROBOT FUTURES will continue to treat clients' personal information as described in this notice. An individual client's right to privacy extends to all forms of contact with ROBOT FUTURES, including telephone, written correspondence and electronic media, such as email messages via the Internet.

ROBOT FUTURES reserves the right to change this privacy notice, and to apply changes to information previously collected, as permitted by law. ROBOT FUTURES will inform clients of any such changes as required by law.

Any questions regarding this Privacy Statement should be directed to Robert J. Ogilvie, at (941) 260-3333 or [Robert@RobotFuturesTrading.com](mailto:Robert@RobotFuturesTrading.com).