

**COMMODITY TRADING ADVISOR
DISCLOSURE DOCUMENT**

Of:



Insignia Futures & Options, Inc.

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REGISTERED WITH THE
COMMODITY FUTURES TRADING COMMISSION

AS A

COMMODITY TRADING ADVISOR

Disclosure Document Date:

May 24, 2010

**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.**

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, ON PAGES 9-10, COMPLETE DESCRIPTIONS 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 PAGES 5-7.

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.

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THE CTA PRINCIPAL

Joseph R. Fallico, president of Insignia Futures & Options, Inc., is directly responsible for all trading and money management decisions within the trading programs. In July 2005, Mr. Fallico listed with the National Futures Association (NFA) as the Principal of Insignia Futures & Options, Inc. Insignia Futures & Options, Inc. registered with the NFA as a member in August 2005 and is the registered CTA (as of November 29, 2007) of the program. Joseph R. Fallico is a principal of the CTA registered with the Commodities Futures Trading Commission (CFTC) and an associate member of the National Futures Association (NFA) since August 8, 2005. In July of 2002, Insignia Futures & Options became a guaranteed introducing broker (GIB) to Farr Financial, Inc. On August 8, 2005, Insignia Futures & Options, Inc. re-registered with the NFA under the new corporate structure of the business as a GIB to Farr Financial, Inc. From July 31, 2001 through September 8, 2005, Insignia Futures & Options was structured as a sole proprietorship. In November of 2004, Insignia Futures & Options incorporated under the laws of the State of Arizona. Insignia Futures & Options was a registered Notice Broker Dealer from November 5, 2002 through September 8, 2005 and as a CTA from July 3, 2001 through October 5, 2002. Insignia Futures & Options, Inc. is currently a registered Notice Broker Dealer since September 8, 2006. The principle place of business for the advisor is Walden Office Square #400, Schaumburg, IL 60173. The advisors telephone number is 847-379-5000. The fax number is 847-925-5421.

The trading programs Mr. Fallico has developed and manages are designed to maximize profits through the speculative trading of commodity futures contracts, options on commodity futures contracts and other commodity futures related interests. The trading programs, in order to achieve its objectives, involve a commensurately high level of risk.

There have been no material administrative, civil or criminal actions concluded within the preceding five years against Joseph R. Fallico, Insignia Futures & Options (IB) or Farr Financial, Inc. (FCM) and no such actions are currently pending or on appeal.

Management Background:

Mr. Fallico began investing in equities and mutual funds while attending Wm. R. Harper College in Palatine, IL. In June of 1985, Mr. Fallico founded and successfully ran LRF Corp., a financial services company specializing in vehicle and equipment financing until June of 1995. From June 1995 through July 2001, Mr. Fallico was employed as an account manager for The Atlas Companies; a Chicago based business-to-business logistics services company. In September of 1991, Mr. Fallico added commodity futures investing to his already successful portfolio of equities and mutual funds. In July of 1999, Mr. Fallico began to concentrate all of his investing skills into the commodity futures markets and in July of 2001, received his series 3 commodity futures broker license and founded Insignia Futures & Options. Mr. Fallico has been a registered Associated Person from August 8, 2005 through the present. Since then, Mr. Fallico has developed several trading strategies for both commodity futures and options on commodity futures. Insignia Futures & Options was initially founded as a sole proprietorship on July 31, 2001 in Palatine, IL and was registered with the National Futures Association until September 8, 2005 at which time the business was restructured as a corporation. Insignia Futures & Options, Inc. registered with the National Futures Association on August 8, 2005 and is currently a member (NFA ID # 358056). Past performance of all accounts directed by Mr. Fallico begins on page 12.

THE COMMODITIES FUTURES BROKER

A reliable commodities futures broker is an essential part of the Advisors trading program. The client is free to choose the Futures Commission Merchant (FCM) or Introducing Broker (IB) with whom the client's account ("Account") will be maintained or introduced. Commissions will be paid by the

Account on terms negotiated by the client with his/her clearing firm. As Insignia Futures & Options is also an IB to Farr Financial, Inc. (FCM), clients who open their account with either Insignia Futures & Options (IB) or Farr Financial, Inc. (FCM) will be charged a commission rate of \$30.00 per round turn contract traded. Insignia Futures & Options, Inc. will receive 75% of the commission for all clients who open an account with Insignia Futures & Options (IB). The Advisor reserves the right to disapprove the clearing firm selected by the client, provided that the basis for disapproval is limited to: (1) excessive commission costs, (2) poor credit standing, and/or (3) poor service and/or reputation.

PRINCIPAL RISK FACTORS

Trading commodity futures and options involves a high degree of risk. In such trading, the liability of the client is not limited to the initial investment of the equity in the client's account, but extends to any and all losses. Listed below are risks associated with trading commodity futures and options, which a client should carefully consider before participating in the trading program.

Futures and options trading is speculative and volatile:

Commodity futures and options markets can be volatile. Price movement of futures and options contracts are influenced by, among other things, changing supply and demand relationships; climate; government agriculture, trade, fiscal, monetary and exchange control programs and policies; national and international political and economic events; crop diseases; the purchasing and marketing programs of different nations; and changes in interest rates. In addition, governments from time to time intervene, directly and by regulation, in certain markets, particularly those in currencies and precious metals. Such intervention is often intended to influence prices directly. The Advisor can control none of these factors and no assurances can be given that his advice will result in profitable trades for a client or that a client will not incur substantial losses.

Futures and options markets may be illiquid:

United States futures and options exchanges impose "daily limits" on the amount by which the price of most futures contracts traded on such exchanges may vary during a single day. Daily trading limits prevent trades from being executed during a given trading day at a price above or below the daily limit and can occur on one or more consecutive days. Once the price of a futures contract has moved to the limit price, it may be difficult, costly, or impossible to liquidate a position. Such limits could prevent the Advisor from promptly liquidating unfavorable positions and restrict his ability to offset commodity futures positions held in the client's account. In addition, even if futures prices have not moved the daily limit, the Advisor may be unable to execute trades at favorable prices if market liquidity is inadequate. It is also possible in a particular contract for an exchange or the CFTC to suspend trading, order immediate settlement, or order that trading be conducted for liquidation only.

Futures and options trading is highly leveraged:

The low margin deposits normally required in commodity futures trading (typically between 2% and 15% of the value of the contract purchased or sold) permit an extremely high degree of leverage. For example, if at the time of purchase, 10% of the contract price 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 deduction for brokerage commissions. A decrease of more than 10% would result in a loss of more than the total margin deposit. Accordingly, a relatively small price movement in a contract may result in immediate and substantial loss to the client. Like other leveraged instruments, 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 client's account does not satisfy the applicable maintenance margin requirement imposed by the client's futures commission merchant (FCM) or introducing broker (IB), the client, and not the Advisor, will receive a margin call from the FCM or the IB. If the client does not

satisfy the margin call within a reasonable time (which may be as brief as a few hours), the FCM or IB may close out the client's position. Although long options are not subject to margin calls, the premium and brokerage expenses invested into them are subject to loss in their entirety.

Failure of a client's FCM:

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.

Counterparty credit risk:

The Advisor trades only through U.S. exchanges, which have the safeguard mechanisms of a clearing organization, which guarantee exchange-traded instruments.

Trading decisions based on technical and/or fundamental analysis:

The Advisor will make trading decisions for the trading programs utilizing technical and/or fundamental analysis. The profitability of these analysis types depends upon the accurate forecasting and interpretation of major price moves and/or market data in certain commodity futures markets. No assurances can be given of the accuracy of the forecasts or the existence of major price moves. The best trading method, whether based on technical and/or fundamental analysis, will not be profitable if there are no price moves or trends of the kind the trading method seeks to follow. In the past, there have been periods without discernible trends and, presumably, such periods will continue to occur in the future. Any factor which would lessen the prospect of major trends in the future (such as increased government control of, or participation in commodity futures markets) may reduce the prospect that a particular trading method, whether technical and/or fundamental, will be profitable in the future. Moreover, any factor which would make it more difficult to execute trades at desired prices in accordance with a trading method's signals (such as a significant lessening of liquidity in a particular market) would also be detrimental to profitability. Further, many other trading methods may utilize similar analyses in making market decisions. Therefore, bunching of buy and sell orders can occur which makes it more difficult for a position to be taken or liquidated. No assurances can be given that the Advisor's trading method and strategies and trading decisions for a client will be successful under all or any market conditions.

Stop Loss orders:

Placing contingent orders, such as "stop-loss" orders, will not necessarily limit losses to the intended amounts, since the market conditions on the exchange where the order is placed may make it impossible to execute such orders. If stop orders are used to enter or exit the market, such orders become market orders when "triggered" and do not ensure that the order will be filled at the price stated on the stop order.

Spread Positions:

If spread positions are used, the customer must be aware that although all futures positions involve risk, and sometimes spread positions are presented as a method of reducing risk, a "spread" position may not be less risky than an outright "long" or "short" position and therefore the loss in a spread position can be substantial.

Trading Futures Options:

When an option or options are purchased, the risk in holding such options is limited to the premium paid and all commissions and fees involved with the trade, while the profit potential is unlimited with respect to call options purchased and limited to the futures price of the commodity dropping to zero with respect to the purchase of put options. When an option is shorted or written, the writer is limited in the return to the amount of the premium received less all commissions and fees charged. The writer of the option is, however, at unlimited risk with respect to the call option and risk on the put option of the amount should the price of the futures contract drop to zero.

Substantial fees and expenses:

Each client is subject to brokerage fees and commissions, which may become substantial, depending on the level and frequency of trading activity. Accordingly, a client's account will have to earn sufficient trading profits to avoid depletion of assets due to such commissions and fees. The client, and not the Advisor, is directly responsible for paying all margins, options premiums, brokerage commissions, "give-up" (\$1-\$4 per contract) charges and fees and expenses incurred in connection with transactions effected for the client's account by the Advisor. A client is responsible for bearing any and all expenses; losses and fees incurred as a result of maintaining and having the Advisor trade the client's account.

Tax consequences:

Each prospective client must consult and must depend on his own tax advisor regarding the federal, state, local, and foreign tax implications of participating in this program. The Advisor does not provide and is not qualified to give tax advice.

General uncertainty concerning futures regulatory changes:

Regulatory changes could have a material and adverse effect on the trading program's prospects for profitability. The United States securities and commodities markets are subject to on-going and substantial regulatory changes, and it is impossible to predict what statutory, administrative or exchange imposed restrictions may become applicable in the future.

Possible adverse effects of increasing assets managed by the Advisor:

CTAs are limited in the assets which they can successfully manage, both by the difficulty of executing substantially larger trades in order to reflect larger equity under management and the restrictive effects of speculative position limits and possible market illiquidity. The rates of return recognized on the trading of limited assets may have little relationship to those an advisor can reasonably expect to achieve trading greater funds. The Advisor has not agreed to limit the amount of additional equity, which he may manage. There can be no assurance that the Advisor's strategies will not be adversely affected by additional client funds.

The preceding list of risk factors is not intended to be a complete explanation of the risks involved in participating in the trading program. Each prospective client who intends to trade commodity futures and options contracts should carefully read this Disclosure Document, the risk disclosure statement at the beginning of this Disclosure Document and the risk disclosure statements of the FCM with particular care and give due consideration to the risks described therein.

THE TRADING PROGRAMS OF THE ADVISOR:

1) EPOCH3

The Markets:

The Advisor's trading program, EPOCH3, currently involves trading contracts in the currencies, equities indices, foods, financials and grains but all domestic futures are monitored and/or possibly traded as opportunities present themselves. Additionally, the Advisor may engage in the purchase of options, the selling (writing) of options or a combination of both resulting in spread strategies in the aforementioned markets. These strategies may be implemented in the control of risk or with the intention of optimizing capital exposure in the markets. At this time, only those contracts listed on U.S. exchanges will be traded. No commodity futures contracts or options on commodity futures contracts traded on foreign exchanges will be implemented within this trading program.

The Program:

EPOCH3 was designed by the Advisor to use a proprietary technically driven program to generate buy and sell signals and refines those signals by applying fundamental/seasonal price tendencies of the markets in question. When the technically driven signal is confirmed by a seasonal tendency, the Advisor further looks at fundamental data of the market, including volatility and liquidity, to determine whether or not to accept the trade. The signals are initially generated by a technical and statistical approach, but are refined by the Advisor to achieve optimal entry and exit to and from the markets.

Market Entry:

When a signal is generated within EPOCH3, primarily all futures and option orders, long or short, will be entered at a specific price utilizing limit orders. At times and discretion, the Advisor may enter or exit a position with a market order based on current market conditions if it is beneficial to the program and client.

Trade/Risk Management:

Once a futures or futures options position is established, a protective Stop-Loss order may be placed depending on the type of position entered. The initial stop is intended to protect account assets. As the trade progresses, the Advisor, at his discretion, may adjust the Stop-Loss order to lessen losses and/or to increase profits. For options positions, Stop-Loss orders are typically only used on short option positions due to their unlimited risk. Because of their limited risk characteristics, long options positions and spread/hedge positions are typically left un-stopped.

As each trade position progresses, the Advisor will attempt to achieve profits by exiting market positions based upon predetermined price levels and/or time frames. When a position contains multiple contracts, the Advisor may liquidate part of the position to adjust market exposure to lessen losses and/or realize profits. All positions will be monitored by the Advisor to best determine market exposure at any given time.

2) MEDALLION

The Markets:

The Advisor's trading program, MEDALLION, currently involves trading contracts in the currencies, equities indices, foods, financials and grains but all domestic futures are monitored and/or possibly traded as opportunities present themselves. Additionally, the Advisor may engage in the purchase of options, the selling (writing) of options or a combination of both resulting in spread strategies in the aforementioned markets. These strategies may be implemented in the control of risk or with the intention of optimizing capital exposure in the markets. At this time, only those contracts listed on U.S. exchanges will be traded.

No commodity futures contracts or options on commodity futures contracts traded on foreign exchanges will be implemented within this trading program.

The Program:

The MEDALLION program is designed to take a more aggressive approach to the markets as compared to the EPOCH3 program. This program will typically generate more trade signals as compared to the EPOCH3 program. Markets are identified through the Advisor's proprietary technical and fundamental analysis and research. Once a market presents a trade opportunity as outlined in the EPOCH3 program information above. A more aggressive approach will be used to take advantage of the trade opportunity.

Market Entry:

When a signal is generated within MEDALLION, primarily all futures and option orders, long or short, will be entered at a specific price utilizing limit orders. At times and discretion, the Advisor may enter or exit a position with a market order based on current market conditions if it is beneficial to the program and client.

Trade/Risk Management:

Once a futures or futures options position is established, a protective Stop-Loss order may be placed depending on the type of position entered. The initial stop is intended to protect account assets. As the trade progresses, the Advisor, at his discretion, may adjust the Stop-Loss order to lessen losses and/or to increase profits. For options positions, Stop-Loss orders are typically only used on short option positions due to their unlimited risk. Because of their limited risk characteristics, long options positions and spread/hedge positions are typically left un-stopped.

As each trade position progresses, the Advisor will attempt to achieve profits by exiting market positions based upon predetermined price levels and/or time frames. When a position contains multiple contracts, the Advisor may liquidate part of the position to adjust market exposure to lessen losses and/or realize profits. All positions will be monitored by the Advisor to best determine market exposure at any given time.

FEES OF THE ADVISORS

Management Fees:

A component of the Advisor's compensation will be a management fee of 0.15% per month (1.8% per annum) of "Net Assets" calculated monthly but payable as of the end of each quarter. "Net Assets" are defined as the sum of all cash and cash equivalents, treasury obligations at their face value, other interest earned, if any, and current market value of all open futures and options positions, less Account liabilities (including accrued commissions and unpaid advisory fees) as determined in accordance with generally accepted accounting principles under the accrual basis of accounting. Accrued management fees will be paid whether or not the Account has earned a profit for the quarter. Net Assets for reporting purposes and fee calculation shall be increased by profits, earned and accrued interest, and additions to the Account, and decreased by losses and withdrawals from the Account. For new Accounts the management fee shall be calculated on a pro rata basis as of the first trade date. To the extent that there are any additions or withdrawals during the month, the management fee shall be adjusted on a pro rata basis for such additions or withdrawals as of the date such additions or withdrawals are made. In the event the Agreement for Advisory Management Services is terminated, the management fee shall be calculated on a pro rata basis as of the date termination occurred. Excessive deposit/withdrawal activity initiated by the client is discouraged and may result in the termination of the advisory agreement. Excessive is defined as more than 2 (two) deposits/withdrawals in a calendar month. Additionally, each account may be accessed a monthly accounting fee in the amount of \$48.00.

Incentive Fees:

The Advisor will charge the client a monthly incentive fee of 20% (twenty percent) on net new profits only. New net profits will establish a "High Water Mark" which will be the basis for determining when incentive fees are payable. If subsequent new profits do not exceed the previous High Water Mark, no incentive fee will be payable until the previous High Water Mark is surpassed. If no new profits are generated within any given calendar month, the Advisor will charge no incentive fee for that month. The incentive fee is payable to the Advisor exclusively on the cumulative net profit as determined at the end of the last trading day of each calendar month. The cumulative monthly net profit is equal to the Net Asset Value (NAV), at the end of a calendar month, less the prior high monthly NAV, less interim capital contributions, plus interim capital withdrawals (including the previous incentive fee). For example, if: (1) the present NAV is \$24,000, (2) the prior high monthly NAV is \$20,000, (3) an interim contribution of \$2,000 was made to the account, and (4) \$1,000 was withdrawn, the total fee payable to the Advisor would be 20% of \$3,000, or \$600. The cumulative monthly net profit shall include by this definition interest or other income not directly related to trading activity. All broker commissions, by definition, are on the date the account is debited. Broker up-front fees are defined as withdrawals. The Advisor reserves the right to reduce or waive the incentive fee on an account-by-account basis. All incentive fees will be retained by the Advisor and will not be repaid to the account. It should be noted that an account may have paid incentive fees for months when it traded profitably even though at some subsequent time the account may have a net loss overall. If the account or advisory agreement is terminated, any incentive fee due shall be payable on the next business day and shall be based on the final net asset value of the account.

BROKERAGE ARRANGEMENTS

Clients are free to select an Introducing Broker of their choice, if any. Introducing Brokers may charge Client accounts an upfront fee of up to 6% of the capital contribution to the client's account. Therefore the net proceeds available at the onset of trading for the designated program will be adjusted to reflect any up front fees taken.

Finder's Fees:

The advisor may pay the Client's Introducing Broker a percentage of earned incentive fees and/or management fees as a finder fee.

OPENING AN ACCOUNT

Each client must read, sign and return to the Advisor the Disclosure Document Acknowledgment page, the original Advisor's Advisory Agreement, the Required Client Information and a copy of the Client Fee Payment Authorization. The original Fee Payment Authorization should be sent to the clients designated commodities futures broker (FCM or IB). The client must also complete the standard package of customer account agreements of his/her chosen commodities futures broker (FCM or IB) and forward copies of any documentation naming the Advisor as "agent" to the Advisor.

Account Size:**EPOCH3 Program...**

The minimum investment of the EPOCH3 program is \$20,000.00 and may be increased in multiples of \$1,000.00 thereof. The program typically generates buy and/or sell signals for 1 to 4 contract positions (based upon market conditions, current open positions and margins requirements) per market and/or options based upon an account size of \$20,000.00. As the account grows, multiple positions will be traded. For example: an account with a balance of \$20,000.00 would trade 1 - 4 contracts on any given trade signal, an account with a balance of \$30,000.00 to \$40,000.00 would trade 3- 7 contracts on the same trade signal. Upon initiation of each new trade, the Advisor will determine the appropriate number of contracts based upon account size as well as profit and risk factors. Due to the high degree of leverage, as the number of contracts traded increases, the amount of risk will also increase. The Advisor, at his discretion, shall reserve the right to reduce client risk exposure by limiting the number of contracts traded

on any given position on either a composite or an account-by-account basis. In order to properly trade the number of contracts required by the program and to reduce the likelihood of margin calls, it is strongly recommended that the account balance be maintained above \$15,000.00.

MEDALLION Program...

The minimum investment of the MEDALLION program is \$50,000.00 and may be increased in multiples of \$1,000.00 thereof. The program typically generates buy and/or sell signals for 5 to 10 contract positions (based upon market conditions, current open positions and margins requirements) per market and/or options based upon an account size of \$50,000.00. As the account grows, multiple positions will be traded. For example: an account with a balance of \$50,000.00 would trade 5 - 10 contracts on any given trade signal, an account with a balance of \$75,000.00 to \$100,000.00 would trade 10- 20 contracts on the same trade signal. Upon initiation of each new trade, the Advisor will determine the appropriate number of contracts based upon account size as well as profit and risk factors. The Advisor, at his discretion, shall reserve the right to reduce client risk exposure by limiting the number of contracts traded on any given position on either a composite or an account-by-account basis. In order to properly trade the number of contracts required by the program and to reduce the likelihood of margin calls, it is strongly recommended that the account balance be maintained above \$30,000.00.

CONFLICTS OF INTEREST AND BROKERAGE ARRANGEMENTS

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

Insignia Futures & Options, Inc. brokerage firm:

As Insignia Futures & Options, Inc. also operates as an Introducing Broker (IB) to Farr Financial, Inc. (FCM), a conflict of interest will exist for clients of Insignia Futures & Options, Inc. who are also clients of the Advisor. The Advisor would receive commissions through Insignia Futures & Options, Inc. (IB) for all trades placed for Advisors clients through this program and as such gives Insignia Futures & Options, Inc. incentive to overtrade a client's account.

Farr Financial, Inc as the FCM:

Insignia Futures & Options, Inc. is a guaranteed introducing broker (GIB) to Farr Financial, Inc., As a result of the commission rebate arrangement with Farr Financial, Inc., Insignia Futures & Options, Inc. may recommend Farr regardless of the clients best interests.

Management of other accounts by the Advisor:

The Advisor may advise other commodity trading accounts, including commodity pools. These accounts may be traded according to the same trading methods described herein. Positions held by all client accounts 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 for his 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 his clients. In addition, certain clients of the Advisor may pay incentive 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 in treating all client accounts alike and his interest in favoring certain clients over others because such clients may pay more in net fees to the Advisor. In rendering trading advice to a client, the Advisor will not knowingly or deliberately favor any other account over the account of a client. No assurance, however, is given that the performance of all accounts managed by the Advisor will be identical or even similar.

Arrangements between FCM's & IB's and the Advisor:

FCM's and IB's may solicit managed accounts for the Advisor and in return, may receive a portion of the brokerage commissions paid to the broker for soliciting such clients. A conflict of interest may be created for the Advisor between his duty to trade clients' accounts in the best interest of clients and his financial interest in preserving his arrangement with the broker, which could be contingent upon generation of adequate commissions or other income from those accounts managed by the Advisor. Acting as a CTA, at this time, the Advisor does not receive any commission rebates or incentives from Farr Financial, Inc. nor any other brokerage firm (FCM or IB).

Additionally, the Advisor will not trade his own proprietary accounts nor will have any financial interest in any account traded.

In evaluating these potential conflicts of interest, clients should be aware that the Advisor has a duty to exercise good faith and fairness in all dealings affecting all accounts for clients.

PERFORMANCE INFORMATION**TRADING RESULTS****MEDALLION Trading Results:**

The Advisor's trading results are for the period starting February 2009 through April 2010 with the actual trading results represented in the table below. The Advisor will manage all customer accounts in the same manner with the following possible exception ... The Advisor has based these performance results on a \$40.00 per round-turn commission rate (inclusive) per futures contract and/or options on futures contract. Based on the negotiated commission with the FCM, customers may pay a higher or lower commission rate and/or fees. Additionally, clients opening their futures brokerage account with Insignia Futures & Options will now pay \$30.00 per round-turn commission rate (inclusive) per futures contract and/or options on futures contract. Additionally, the performance results shown below from February 2009 through April 2010 represent an incentive fee of 18%. Beginning in June 2010, the incentive fee assessed will be 20%.

MEDALLION Performance Capsule:

Explanations for the following performance information: Rate of return is the percentage of the net performance divided by the beginning net asset for the month. The year rate of return is the percentage computed by applying on a compounded basis each of the monthly rates of return to the beginning net asset value for the initial trading period. "The term "drawdown" means loss experienced by an account and is expressed as a percent decline. ""The term "worst peak-tovalley drawdown" means the greatest cumulative percentage decline in month-end net asset value due to losses sustained during any period in which the initial month-end net asset value is not equaled or exceeded by a subsequent month-end net asset value.

MEDALLION PROGRAM RESULTS

Name of Trading Program: Medallion

Name of CTA: Insignia Futures & Options, Inc.

Date the Advisor Began Trading Client Accounts February 2009

Date the Advisor Began Trading the Program February 2009

Total Number of Accounts Traded Pursuant to the Program as of April 2010: 2

Total Actual Assets Under Management: \$1,030,529.21

Total Actual Assets Under This Program: \$931,075.95

Worst Monthly Drawdown: -26.90% ... July 2009

Worst Peak-to-Valley Drawdown: -30.77% - April 2009 to July 2009

Number of Profitable Accounts That Have Opened & Closed Since February 2009: n/a

Range of Returns Experienced by Profitable Accounts: n/a

Number of Losing Accounts that have Opened & Closed Since February 2009: n/a

Range of Returns Experienced by Losing Accounts: n/a

MEDALLION Rate of Return		
MONTH	2010	2009
JAN	4.49%	- - -
FEB	12.61%	-3.55%
MAR	3.07%	7.66%
APR	0.60%	5.32%
MAY		-24.14%
JUN		24.83%
JUL		-26.90%
AUG		28.88%
SEP		9.16%
OCT		7.77%
NOV		9.25%
DEC		5.36%
YTD	22.01%	32.13%
SINCE INCEPTION:		61.21%

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Program Notes:

1. Worst Monthly Drawdown is the largest monthly loss experienced by the program in any calendar month expressed as a percentage of the total equity in the account and includes the month and year of such drawdown.
2. Worst Peak-to-Valley Drawdown is the greatest cumulative percentage decline in month end net asset value of the program due to losses sustained by an account during any period in which the initial month-end net asset value of an account is not equaled or exceeded
3. Rate of Return is calculated by dividing the Net Performance by the Adjusted Beginning Net Asset Value

(Beginning Net Asset Value plus time weighted additions and withdrawals) multiplied by 100.

EPOCH3 TRADING RESULTS

EPOCH3 Trading Results:

The Advisor's trading results are for the period starting July 2009 through April 2010 with the actual trading results represented in the table below. The Advisor has based these performance results on a \$30.00 per round-turn commission rate (inclusive) per futures contract and/or options on futures contract. Based on the negotiated commission with the FCM, customers may pay a higher or lower commission rate and/or fees. Additionally, clients opening their futures brokerage account with Insignia Futures & Options will pay \$30.00 per round-turn commission rate (inclusive) per futures contract and/or options on futures contract. Additionally, clients opening their futures brokerage account with Insignia Futures & Options will now pay \$30.00 per round-turn commission rate (inclusive) per futures contract and/or options on futures contract. Additionally, the performance results shown below from February 2009 through April 2010 represent an incentive fee of 18%. Beginning in June 2010, the incentive fee assessed will be 20%.

EPOCH 3 Performance Capsule:

Explanations for the following performance information: Rate of return is the percentage of the net performance divided by the beginning net asset for the month. The year rate of return is the percentage computed by applying on a compounded basis each of the monthly rates of return to the beginning net asset value for the initial trading period. "The term "drawdown" means loss experienced by an account and is expressed as a percent decline. ""The term "worst peak-to-valley drawdown" means the greatest cumulative percentage decline in month-end net asset value due to losses sustained during any period in which the initial month-end net asset value is not equaled or exceeded by a subsequent month-end net asset value.

EPOCH3 PROGRAM RESULTS

Name of Trading Program: Epoch3

Name of CTA: Insignia Futures & Options, Inc.

Date the Advisor Began Trading Client Accounts: February 2009

Date the Advisor Began Trading this Program: July 2009

Total Number of Accounts Traded Pursuant to the Program as of April 2010: 6

Total Actual Assets Under Management: \$1,030,529.21

Total Actual Assets Under This Program: \$99,453.26

Worst Monthly Drawdown: -3.40% ... January 2010

Worst Peak-to-Valley Drawdown: -3.52% - December 2009 to January 2010

Number of Profitable Accounts That Have Opened & Closed Since July 2009: n/a

Range of Returns Experienced by Profitable Accounts: n/a

Number of Losing Accounts that have Opened & Closed Since July 2009: n/a

Range of Returns Experienced by Losing Accounts: n/a

EPOCH3		
Rate of Return		
MONTH	2010	2009
JAN	-3.40%	- - -
FEB	7.30%	- - -
MAR	-0.48%	- - -
APR	2.70%	- - -
MAY		- - -
JUN		- - -
JUL		0.02%
AUG		7.99%
SEP		5.27%
OCT		0.20%
NOV		11.25%
DEC		8.25%
YTD	5.94%	37.20%
SINCE INCEPTION:		45.34%

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Program Notes:

1. Worst Monthly Drawdown is the largest monthly loss experienced by the program in any calendar month expressed as a percentage of the total equity in the account and includes the month and year of such drawdown.
2. Worst Peak-to-Valley Drawdown is the greatest cumulative percentage decline in month end net asset value of the program due to losses sustained by an account during any period in which the initial month-end net asset value of an account is not equaled or exceeded
3. Rate of Return is calculated by dividing the Net Performance by the Adjusted Beginning Net Asset Value (Beginning Net Asset Value plus time weighted additions and withdrawals) multiplied by 100.

PROPRIETARY TRADING RESULTS

The following proprietary trading results of the advisor were generated from the period January 2005 through July 2007. These results were derived from trading a program separate and different from this disclosure document's Epoch3 & Medallion trading program. Although the proprietary trading program did utilize the same futures options strategies similar to the Epoch3 and Medallion trading programs, it did differ in that in it also utilized currency futures spread strategies. This program has been closed and is no longer trading.

Proprietary Performance Capsule:

THE FOLLOWING PERFORMANCE CAPSULE IS FOR THE ADVISORS PROPRIETARY TRADING. PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Explanations for the following performance information: Rate of return is the percentage of the net performance divided by the beginning net asset for the month. The year rate of return is the percentage computed by applying on a compounded basis each of the monthly rates of return to the beginning net asset value for the initial trading period. "The term "drawdown" means loss experienced by an account and is expressed as a percent decline. ""The term "worst peak-tovalley drawdown" means the greatest cumulative percentage decline in month-end net asset value due to losses sustained during any period in which the initial month-end net asset value is not equaled or exceeded by a subsequent month-end net asset value.

Name of CTA:

Insignia Futures & Options, Inc.

Name of Trading Program:
(Proprietary)

Program Trading Inception Date:

January 27, 2005

* Worst Monthly Drawdown:

-55.22% ... July 2006

** Worst Peak-to-Valley Drawdown:

-67.70% - June 2006 through August 2006

Rate of Return			
Month	2007	2006	2005
January	15.18%	-42.48%	-2.15%
February	9.92%	43.57%	9.97%
March	38.63%	7.16%	-11.28%
April	2.48%	19.70%	22.93%
May	-21.00%	55.02%	15.58%
June	-37.51%	9.45%	12.04%
July	-14.02%	-55.22%	18.52%
August	*****	-27.87%	4.90%
September	*****	50.04%	10.59%
October	*****	32.72%	14.81%
November	*****	-23.95%	-15.05%
December	*****	59.33%	-2.62%
Year	-23.65%	40.09%	98.48%

Program Notes: The above proprietary returns are presented pro forma and include program commissions calculated at a total rate of \$30.00 per round turn per contract plus an 18% incentive fee & a 1.8% annual management fee.

Worst Monthly Drawdown is the largest monthly loss experienced by the program in any calendar month expressed as a percentage of the total equity in the account and includes the month and year of such drawdown.

Worst Peak-to-Valley Drawdown is the greatest cumulative percentage decline in month end net asset value of the program due to losses sustained by an account during any period in which the initial month-end net asset value of an account is not equaled or exceeded

DISCLOSURE ACKNOWLEDGMENT

I have received a copy of the May 24, 2010 Disclosure Document for the Insignia Futures & Options, Inc. CTA Trading Programs, EPOCH3 and MEDALLION.

Client Signature: _____ Date: _____

Printed Name: _____

Client Signature: _____ Date: _____

Printed Name: _____

ADVISORY AGREEMENT

**INSIGNIA FUTURES & OPTIONS, INC.
COMMODITY TRADING ADVISOR**

This Agreement, between Insignia Futures & Options, Inc. (hereinafter referred to as the "Advisor") and the undersigned person (hereinafter referred to as the "Client"), effective as of the date set forth next to Client's signature is as follows:

- 1) The Advisor agrees to accept and the Client hereby appoints the Advisor as the Client's true and lawful attorney, in fact, to have complete and absolute discretionary authority over the futures/option trading account to buy, sell, trade and otherwise deal in the futures/option account through the broker. The Power of Attorney shall survive the Client's death or incapacity until the futures/option account is closed as provided below and all positions have been liquidated.
- 2) The Client represents and warrants the Advisor that he/she is of legal age to be bound by this contract, legally competent and that he/she has knowledge and experience in financial matters and is capable of evaluating the merits and risk of this investment. The Client also represents to the Advisor that he/she has received, read and understands both the RISK DISCLOSURE STATEMENT and OPTIONS DISCLOSURE STATEMENT and will execute contemporaneously with this agreement all documents necessary to open a futures/option trading account with a registered FCM or IB.
- 3) The Client has deposited initial equity of \$ _____ (ACTUAL FUNDS) to participate in the following program (select one program below):
 _____ EPOCH3 Program (\$20,000.00 minimum)
 _____ MEDALLION Program (\$50,000.00 minimum)
- 4) The futures/option account may be closed at any time by either party by written notice to the other party and copies forwarded to the FCM. Any and all fees accumulated by the Advisor shall be paid directly to the Advisor prior to the FCM dispersing remaining funds to the Client.
- 5) THE CLIENT ACKNOWLEDGES THAT THIS AGREEMENT REPRESENTS THE ENTIRE AGREEMENT BETWEEN THE CLIENT AND THE ADVISOR AND THAT THERE ARE NO OTHER ORAL OR WRITTEN REPRESENTATIONS, AGREEMENTS, ARRANGEMENTS OR UNDERSTANDINGS OTHER THAN THOSE WRITTEN IN THIS DOCUMENT.

CLIENT:

Signature: _____ Date: _____

Printed Name: _____

Signature: _____ Date: _____

Printed Name: _____

ADVISOR:

Signature: _____ Date: _____

REQUIRED CLIENT INFORMATION

(CONFIDENTIAL, to be completed and signed by the Client)

Name: _____

Address: _____

City: _____ State / Province: _____

Zip / Postal Code: _____ Country: _____

Home Phone: _____ Work Phone: _____

Email Address: _____

Occupation: _____

Date of Birth: _____ Social Security Number: _____

Annual Income: _____ Net Worth: _____

Initial Deposit Amount of Managed Futures/Options Account: _____

Is this amount more than 20% of your net worth? Yes _____ No _____

Have you read the "Risk Factors" in the Disclosure Document? Yes _____ No _____

Investment Experience:

Stocks, Bonds, Real Estate, etc.: _____ years.

Commodities or Options: _____ years.

I (we) hereby certify that the information provided herein is true and correct as of the date below.

Signature: _____ Date: _____

Signature: _____ Date: _____

REQUIRED CLIENT INFORMATION

(Additional risk disclosure. Please check all that apply)

- No previous investment experience
- Under the age of 25 or Over the age 65
- Annual Salary below \$50,000
- Account size exceeds 20% of stated net worth

THE CLIENT HAS BEEN INFORMED THAT THE RISK OF LOSS IN TRADING COMMODITY FUTURES AND OPTIONS CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. THE HIGH DEGREE OF LEVERAGE THAT IS OBTAINABLE IN FUTURES AND OPTIONS TRADING CAN WORK AGAINST YOU AS WELL AS FOR YOU. THE USE OF LEVERAGE CAN LEAD TO LARGE LOSSES AS WELL AS GAINS.

THIS BRIEF STATEMENT CANNOT, OF COURSE, DISCLOSE ALL THE RISKS AND SIGNIFICANT ASPECTS OF THE FUTURES AND OPTIONS MARKET.

THE UNDERSIGNED ACKNOWLEDGES RECEIPT OF THIS ADDITIONAL DISCLOSURE STATEMENT, AND ACKNOWLEDGES THAT HE/SHE HAS READ AND UNDERSTANDS THE TERMS ABOVE.

CLIENT SIGNATURE: _____ DATE: _____

PRINTED NAME: _____

CLIENT SIGNATURE: _____ DATE: _____

PRINTED NAME: _____

ADVISOR SIGNATURE: _____ DATE: _____

CLIENT (to CTA) FEE PAYMENT AUTHORIZATION

INSIGNIA FUTURES & OPTIONS, INC.
COMMODITY TRADING ADVISOR

The undersigned person(s) (hereinafter referred to as the "Client") agrees to pay Insignia Futures & Options, Inc. without further notice or previous additional consent of the Client, according to the fee schedule described in the Insignia Futures & Options, Inc. Disclosure Document.

THE AGREED UPON FEE WILL BE: 0.15% (1.8% PER ANNUM) MONTHLY ADMINISTRATIVE MANAGEMENT FEE (PAYABLE ON A QUARTERLY BASIS), BASED ON THE NOMINAL SIZE OF THE ACCOUNT, PLUS 20% MONTHLY INCENTIVE FEE ON NET PROFITS. A \$48.00 MONTHLY ACCOUNTING FEE MAY ALSO BE ASSESSED TO CLIENT'S ACCOUNT.

The FCM or IB is hereby authorized to make such payment to Insignia Futures & Options, Inc. directly from the undersigned client(s) futures/option trading account upon receipt of invoice from Insignia Futures & Options, Inc.

ACCOUNT NAME(S) (please print): _____

CLIENT SIGNATURE: _____ DATE: _____

CLIENT SIGNATURE: _____ DATE: _____