

Firm Brochure

(Part 2A of Form ADV)

R.J. O'Brien Investment Management, LLC

222 Riverside Plaza #900

(312)-373-4960

03-31-2012

This Brochure provides information about the qualifications and business practices of R.J. O'Brien Investment Management, LLC ("RJOIM"). If you have any questions about the contents of this Brochure, please contact Nancy Westwick at 312-373-5215 and/or email [nwestwick@rjobrien.com](mailto:nwestwick@rjobrien.com).

The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

R.J. O'Brien Investment Management, LLC is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about R.J. O'Brien Investment Management, LLC also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## **Item 2 – Material Changes**

On July 28, 2010, the United State Securities and Exchange Commission published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure dated 03-31-2012 is a new document prepared according to the SEC’s new requirements and rules. As such, this Document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of such changes. We will also reference the date of our last annual update of our brochure.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Brochure may be requested by contacting Nancy Westwick, Chief Compliance Officer, at (312)-373-5215 or [nwestwick@rjobrien.com](mailto:nwestwick@rjobrien.com) free of charge.

Additional information about R.J. O’Brien Investment Management, LLC is also available via the SEC’s web site [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC’s web site also provides information about any persons affiliated with RJOIM who are registered, or are required to be registered, as investment adviser representatives of RJOIM.

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#### **Item 4 – Advisory Business**

RJO Investment Management LLC (“RJOIM”) was established in 2007 and was recently registered as an investment advisor on May 7, 2010. RJOIM is registered as an Investment Adviser with the U.S. Securities and Exchange Commission, though such registration should not be taken to imply a certain level of skill or training. The oral and written communications of an adviser provide you with information with which you may use to determine to hire or retain that Adviser. RJOIM offers various investment advisory services to clients. Clients may negotiate other services as needed. All clients are required to enter into an Investment Advisory Agreement with RJOIM.

RJOIM specializes in active, short-term fixed income management and advisory services for mutual funds, managed futures funds, hedge funds, institutional, and in customer securities lending activities. RJOIM is structured in two separate distinct advisory divisions. Each division is focused in the area that they have in depth experience, personnel, and resources to assist clients in meeting their objectives.

The first division RJOIM Cash Management (“CM”) is focused on separately managed accounts that provide services with a strong emphasis on short-term cash management; including fixed income investment advisory and treasury services primarily structured for futures commission merchants (“FCM”), commodity pools operators (“CPO”), investment company public and private funds, high net-worth individuals, and other institutional alternative asset entities with the need for short term duration portfolios. These services are structured to assist clients with managing their short duration portfolios and liquidity demands while seeking to provide a reduction in the haircut charges normally applied to institutions with a less detailed program.

The second division RJOIM Mutual Fund Management (“MFM”) was established for the purpose of the creation, supervision, and management of investment company products and private funds with an emphasis on selecting investments and/or funds to achieve the specific fund’s objectives. The division may act alone as the primary advisor or in conjunction with sub-advisors to manage the fund’s investment objectives. When a sub-advisor is selected the division will monitor the sub-advisor(s) trading activity for compliance, leverage, and other restrictions stipulated in the funds’ offering documents.

The client-directed services offered by both RJOIM divisions include custody and non-custody related activities which may encompass the processing of wires, futures and securities trades. As it relates to MFM, investors should carefully consider the investment objectives, risks, charges and expenses of the funds, and should carefully read the prospectus before investing or sending money.

RJOIM does not take action with respect to any securities or other investments that become the subject of any legal proceeding, including bankruptcies.

RJOIM is principally owned by RJO Holdings Corp., which in turn is 100 % owned by RJO Investor Corp., which is in turn is owned 100% by RTS Investor Corp. the ultimate parent of the RJO family of entities.

Currently RJOIM CM’s Division has not imposed restrictions to advisory clients’ accounts based on broker selection, custodian, or other client specific matters; however, this is subject to change at

any time if the restriction would create an environment where RJOIM could not carry out its services.

As it relates to RJOIM MFM, restrictions or limitations are specified in the funds offering documents. When custodial services are required, RJOIM recommends the use of Wells Fargo Bank custodial services. The recommendation comes from our review with a primary emphasis placed upon financial strength, customer service and technological capabilities. However, RJOIM will entertain any client's custodian relationship absent a legal or regulatory objection, or the ability to perform its services.

As of December 31, 2011 RJOIM had Assets Under Management ("AUM") of \$3,676,945,057.

### **Item 5 – Fees and Compensation**

In both divisions investment advisory fees are based upon assets under management; however they are calculated in accordance with the following two schedules. Clients electing to utilize the independent custodian recommended by RJOIM, currently Wells Fargo Bank custodial services provide written authorization permitting fees to be paid directly from the client's custodial account. Client fees are calculated and accrued on a daily basis, based on the principal amount of assets under management. Fees are paid by the client in arrears.

RJOIM sends the client a statement showing the amount of the fees for each month, the principal amount of the assets under management on which the fees were based, and the specific manner in which the fees were calculated. Fees are disbursed by the custodian directly to RJOIM.

When client assets are invested in a money market fund, clients incur fees and expenses of that money market fund in addition to RJOIM's investment advisory fees.

If a client designates its own custodian, we invoice the client directly on a monthly basis. Custodial fees and related securities transaction fees are paid directly by the client. Escrow and continuous offering processing fees, if applicable, are billed to the client on a monthly basis. In addition to fees paid to RJOIM, as described above, clients may incur brokerage and other transaction costs (see Item 12, below).

The CM Division fee is calculated based upon a 360 day year and are exclusive of brokerage commissions, transaction fees, and other related cost and expenses which shall be incurred by the client. Under the terms of the Investment Management Agreement, RJOIM is authorized to debit a client's account for the amount of such fees on the first business day of the following month. At the same time the month-end statements are delivered to the client and its agents.

0.25 of 1% on the first \$50,000,000 of short-term fixed income assets under management  
0.20 of 1% on the next \$50,000,000  
0.15 of 1% on the next \$400,000,000  
0.10 of 1% on amounts above \$500,000,000

The MFM Division will act as investment manager of one or more Funds. While each Fund will have its own investment strategy and other specifications, the arrangements between each Fund and MFM will generally be the same.\* In its role as investment manager, MFM allocates Fund assets to

other funds or, affiliates. MFM will receive monthly and quarterly management fees from each Fund. MFM's fee is calculated based upon a 365 day year and are exclusive of brokerage commissions, transaction fees, and other related cost and expenses which shall be incurred by the client either directly or indirectly through the Fund's NAV or expenses. MFM does not have a standard fee, since each client may require additional services or resources. As a standard industry practice we estimate the client fee to be in the range of 1.5% on all assets under management.\*\* Under the terms of the Investment Management Agreement, MFM will submit to the fund's administrators an invoice for the time period as specified in the fund's offering documents. MFM may use a portion of its management fees, not that of a client, to pay referral fees to independent broker/dealers who refer investors to a Fund including RJO Securities, LLC, which is closely associated with RJOIM.

\* It is important for all interested persons to carefully read and understand the prospectus also known as the Fund's offering documents fully. Always consider the risk, fees, limitations, restrictions, and expenses of the particular investment before investing. Investing in any fund involves risk and the possible loss of principal.

\*\*Both RJOIM Divisions reserves the right to reduce the standard fee in its sole discretion. As it pertains to MFM, in most instances the AUM of the fund will be allocated into two parts a cash management and an investment component. Each component will have its own standard fee but will not exceed 1.5% of the combined assets under management.

In both divisions, client statements may be delivered either by electronic email (pursuant to client informed consent) and/or by U.S. postal service as agreed to. The method selected will be agreed to by both parties as a means to provide notice for account statements and communications. Assets in all portfolios of a client will be aggregated for purposes of calculating assets under management.

In both divisions, the management fees are negotiable depending upon various factors, including account size, investment strategy being used, responsibilities involved, relationship to RJOIM, and composition of the portfolio. The management fees are normally calculated daily and debited monthly in arrears, on the first day of the following calendar month. As it relates to MFM, their management fee is calculated daily and reflected in the Fund's Net Asset Value ("NAV") share price.\* Under the CM division the client or RJOIM generally may terminate the investment advisory contract at any time by submitting 30 days written notice as provided for in the investment management agreement.

\* Please refer to the Fund's offering documents for more complete information including risk, fees, limitations, restrictions, and expenses of the particular investment before investing. Investing in any fund involves risk and the possible loss of principal.

In addition to the schedules of fees set forth above applicable to new clients, certain clients may pay a fixed management fee. RJOIM may offer a discount from, or waive, its standard fee schedules for accounts of persons associated with RJOIM or members of their families.

#### Multiple Fees Associated with Non-Affiliated Funds

RJOIM seeks to utilize all client assets to achieve the client objectives but in certain circumstances the account may be invested in non-affiliated open-end investment company fund (money market funds) due to the small amount of investable funds or short non-typical time constraints imposed by the client's liquidity demands. Open-end investment companies pay advisory fees to their investment advisors. The impact of this management fee is the reduction of the fund's net asset value. RJOIM clients therefore are paying two levels of investment advisory fees. One fee is paid

out of the open-end investment company assets and the second fee is paid by the client to RJOIM as investment advisor. RJOIM does not receive any portion of the fee paid out of the open-end investment company.

#### **Multiple Fees Associated with Affiliated Funds related to the Mutual Fund Services Division**

RJOIM has put in place a policy barrier to restrict Clients from investing assets in an advisory account that would invest in an open-end investment company fund, or other collective investment fund, registered or non-registered, for which RJOIM's MFM Division serves as investment advisor (Affiliated Fund") or has an interest. The reasoning supporting this policy is RJOIM's allocations of advisory accounts assets to Affiliated Funds would result in RJOIM and/or the firm receiving higher fees, compensation or other benefits than if RJOIM makes allocations solely to account or to their funds managed by third parties. RJOIM would have an incentive to make allocations to Affiliated Funds. Furthermore, RJOIM would have an interest in allocating Advisory Account assets to Affiliated Funds that impose higher fees than those imposed by other Affiliated Funds as applicable. If a Client insisted that RJOIM purchase an Affiliated fund, RJOIM reserves the right, in its sole discretion, to waive, reduce, or rebate fees that would otherwise be payable to RJOIM in connection with RJOIM's allocation of Advisory Accounts' assets to Affiliated Funds. In addition, the Client retains the option to purchase RJO's affiliated fund through other brokers or agents that are not affiliated with RJOIM.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

RJOIM does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

#### **Item 7 – Types of Clients**

RJOIM provides portfolio management services to clients consisting mainly of FCMs, futures and hedge funds, investment companies and private and institutional investors. Approximately 100% of the firm's clients are either FCMs, futures funds, hedge funds, or investment companies.

In general, RJOIM is authorized by its clients to determine and execute transactions within the specific investment criteria and parameters outlined in each client's advisory contract and without consultation on a transaction-by-transaction basis. The amount of securities bought or sold is determined through evaluation of individual account balances, investment objectives and market and interest rate considerations. Clients may terminate the relationship at any time upon written notice or as stipulated in the client agreement or offering documents.

Each Division tailors its business model to provide advisory services to the following types of clients detailed below.

CM provides portfolio management services to futures commission merchants ("FCM"), commodity pools operators ("CPO"), introducing brokers ("IB"), investment company public and private funds, high net-worth individuals and other institutional alternative asset entities.

All CM clients must establish a brokerage account or an account at a custodian. The client pays the fees for establishing and maintaining such accounts including brokerage commissions, transaction fees, and other related cost and expenses.

The CM Division has set the minimum account size for accepting institutional clients as \$25 million; the minimum management fee is \$25,000 annually. However, the minimum fees may be waived or reduced by RJOIM in its sole discretion.

MFM's clients are limited to one or more private, hedge fund, registered investment company, pooled investment vehicles (referred to herein as the Funds). MFM acts as the manager of one or more investment funds. While each Fund will have its own investment strategy and other specifications, the arrangements between each Fund and MFM will be generally the same. In its role as investment manager, MFM may allocate a portion of its investable assets to separate funds or account managers. In these cases, once allocated, MFM does not exercise discretion with respect to the underlying investments purchased for the Funds by the underlying funds and/or selected Managers. The specific investment program of each Fund will be described in that Fund's offering documents.

It is important for all interested persons to carefully read and understand the prospectus also known as the Fund's offering documents fully. Always consider the risk, fees, limitations, restrictions, and expenses of the particular investment before investing. Investing in any fund involves risk and the possible loss of principal. MFM has set the minimum account size for accepting institutional clients at \$15 million. The minimum management fee is \$75,000 annually. The minimum fees required to start a fund may be waived or reduced by MFM in its sole discretion.

#### **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

RJOIM's CM constructs separate portfolios to meet each client's individual investment and liquidity needs. For each client, RJOIM seeks to optimize returns while providing portfolio liquidity, while operating within the agreed-upon risk tolerance parameters specified by each client. Prior to any portfolio investment decisions being undertaken, all clients complete an Investment Advisory Agreement. This Agreement not only delineates the specifics of the relationship, but also sets out the investment parameters and specific details set by the client. For each client, there can be further differentiation in securities purchased due to liquidity needs. RJOIM strives to treat all clients in a fair and equitable manner. Each client's portfolio is customized to meet specific investment objectives and requirements.

The CM utilizes a rule based strategy allocation system using Certificates of Deposit, Commercial Paper, Reverse Repurchase Agreements, US Government and US Agency securities, and money market mutual funds in certain situations. Investing in securities involves risk of loss that clients should be prepared to bear.

When practical, client trades in the same security will be aggregated in a single order (a "block") in an effort to obtain execution at the best security price available. When employing a block trade, client allocations will be determined before or at the time the trade is executed by the broker-dealer unless RJOIM purchases a security with a future settlement date. If RJOIM purchases a security with a future settlement date, a client or group of clients is selected at the time of trade. The client or



group of clients is determined by the client's portfolio parameters (i.e., eligible securities, investment criteria) and maturity restrictions. However, actual par amounts are not determined and allocated until the trade settles based on cash availability and liquidity considerations at settlement for each client

CM's allocation management systems allows monitoring of a variety of risk issues such as issuer concentration, mark to market, credit rating changes and WAM, if listed in the client parameters for the account. However with any investment the outcome is unpredictable and random and the investor can lose a portion or all of the investment.

MFM utilizes a hands on approach by conducting due diligence on fund managers and may rely upon investigations and analyses by third parties with respect to such fund manager and managed account advisors including RJOIM's CM services. MFM may also review documents provided by fund managers and managed account advisors concerning past performance, portfolio mix, leverage reports, risk models, current holdings, real time account viewing and other electronic reports. MFM's analysis and risk monitoring approach is designed to monitor and manage risk but not eliminate it. Investing in funds involves risk and the possible loss of principal. Client should not invest more than they could bear to lose.

RJOIM does not offer any products or services that guarantee rates of return on investments for any time period to any client. Investing in securities of any type may result in the loss of principal. All clients also assume the risk that investment returns may be negative or below the rates of return of other investment advisers, market indices or investment products. Investment returns can fluctuate as the investment environment changes. Among circumstances in the fixed income investment and commodities & futures universe that can affect returns are interest rate changes, defaults, ratings downgrades, energy demands, or geopolitical events or trends.

All RJOIM's personnel prior to being hired must conduct a pre-hire review and application of the person's character, identity, and regulatory background; the information is also processed through an independent third party for validation. In addition finger prints may be taken for individuals with key responsibilities, internal control measures, or for operational security and are processed either through the NFA or FINRA. These regulatory bodies link the finger print data through the FBI's criminal data base center for screening. All RJOIM's personnel records are clear and it has no events to disclose.

#### **Item 9 – Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of RJOIM or the integrity of RJOIM's management. RJOIM has no information applicable to this Item.

#### **Item 10 – Other Financial Industry Activities and Affiliations**

RJOIM is part of The RJ O'Brien family of entities of which is ultimately held by RTS Investor Corp. ("the Firm"). The Firm which is a worldwide holding company encompassing a full-service FCM, broker-dealer, asset management and variety of financial services organization, and a agency broker in global financial markets. As such, the Firm acts as an investor, investment manager,

advisor, agent and principal, and has other direct and indirect interests, in the global fixed income, currency, commodity, equity, and other markets in which accounts, including registered and non-registered funds, sponsored, managed or advised by RJOIM ("Advisory Accounts") directly and indirectly invest.

As a result, the Firm, and its affiliates including RJOIM, directors, partners, trustees, managers, members, officers and employees (collectively, the "Firm"), including those who may be involved in the management, sales, investment activities, or business operations of RJOIM and distribution of the Advisory Accounts, are engaged in businesses and have interests other than that of managing RJOIM accounts.

Client Advisory Accounts are only entitled to compensation if any that is generated in their account and not to any businesses of the Firm or RJOIM.

The activities and interests of the Firm include potential multiple advisory, transactional, and financial and other interests in commodities, securities, instruments and companies that may be directly or indirectly purchased or sold by the Firm and its affiliates including RJOIM for Advisory Accounts.

These activities and interests also include potential multiple advisory, transactional and financial and other interests with consultants and distributors who may advise in the opening of Advisory Accounts. Such additional businesses and interests may give rise to potential conflicts of interest of which investors should be aware and which may cause conflicts that could disadvantage the Advisory Accounts.

Certain principal executive officers of RJOIM (including, but not limited to, the Chief Executive Officer, Chief Financial Officer, and Chief Compliance Officer) provide management, financial, operational and compliance services to affiliates of RJOIM. Each of the principal executive officers identified above devote the majority of their time to providing management, financial, operational and compliance services to other RJO affiliates including, R.J. O'Brien & Associates, LLC, a federally-registered Futures Commission Merchant.

RJOIM's affiliated Futures Commission Merchant (R.J. O'Brien & Associates, LLC) provides certain back office and administrative services to RJOIM under a separate service agreement. In addition, RJOIM provides investment advisory services to R.J. O'Brien & Associates, LLC under similar terms and conditions and subject to an Investment Management Agreement as any other Client.

#### Other Financial Industry Activities or Affiliations

RJOIM has relationships with, and may utilize, suggest or recommend the services of, all of its affiliated entities within the Firm including but not limited to R.J. O'Brien & Associates, LLC, R.J. O'Brien Securities, LLC, R.J. O'Brien Alternative Asset Management, LLC, R.J. O'Brien Fund Management, LLC, Global Diversified Managed Futures Fund, L.P., and RJO Global Trust in connection with its activities. The particular services involved will depend on the types of services offered by the affiliated entity. Certain of RJOIM's trading, operations, and other activity may be delegated to affiliated entities in RJOIM's discretion. The arrangements will generally involve sharing or joint compensation related to each entity's responsibilities for the client, subject to the

requirements of applicable law. Clients who engage RJOIM are subject to RJOIM's business policies and procedures including with respect to potential conflicts of interest. Below is a short narrative of each of the affiliated entities listed above:

(RJO Securities, LLC) Broker Dealer

With respect to arrangements with a related person who is an broker dealer that introduces funds which may be affiliated with RJOIM, clients would be charged the applicable sales charge as stated in the Fund's offering documents, and such affiliates and employees there of would generally receive, remuneration paid by the client. In addition, to advisory fees paid, other remuneration may take the form of referral fees. Referral fees will be paid out from a portion of RJOIM's management fee and not as an additional fee to the client.

Investment Company(s) and other Private Funds such as the (RJO Global Trust), (Mariner Hyman Beck) Fund) and (Global Diversified Managed Futures Fund)

With respect to arrangements with a related person who is an investment company, RJOIM acts in an advisory or sub-advisory capacity to a variety of investment companies for which RJOIM or an affiliate thereof acts as advisor, sub-advisor, administrator and/or distributor and may receive revenue from the products recommended, consulting fees, or the products directly. In connection therewith, certain respect of RJOIM's personnel are directors, trustees, and /or officers of such investment companies and as such are compensated. Arrangements with respect to the sale of shares of investment companies are set forth in each investment company's prospectus. Similar participations and arrangements may exist with respect to pooled vehicles not subject to the Investment Company Act, all in accordance with applicable law.

Commodity Pool Operator, Commodity Trading Advisor, Futures Commission Merchant

With respect to arrangements with a related person who is a commodity pool operator ("CPO"), commodity trading advisor ("CTA") or futures commission merchant ("FCM"), RJOIM has affiliates registered with the Commodity Futures Trading commission as an FCM, and/or as a CPO and/or CTA including but not limited to R.J. O'Brien & Associates, LLC, R.J. O'Brien Alternative Asset Management, LLC, R.J. O'Brien Fund Management, LLC. To the extent permitted by law and applicable regulations, RJOIM may utilize as FCM or CTA in connection with RJOIM's purchase or sale of futures on behalf of certain of its client and such FCM or CTA affiliates may receive remuneration for such services in the form of commissions.

Entity that Creates or Packages Limited Partnerships

With respect to arrangements with a related person who is an entity that creates or packages limited partnerships and other private investment vehicles, the Firm, RJOIM, or its affiliates may create and/or distribute such vehicles that are privately placed and not registered under the Act and may receive fees in connection therewith.

Entity that provides technical support services to other R.J. O'Brien Family of entities

RJO Technology, LLC provides technology services to the other RJO entities and is compensated for services performed.

Foreign Commodity Pool Operator, Commodity Pool Operator, and Futures Commission Merchant

With respect to arrangements with a related person who is a foreign commodity pool operator, commodity trading advisor, or futures commission merchant, RJOIM affiliates specific to this

category are: R.J. O'Brien & Associates Canada Inc. which is registered with the Investment Industry Regulatory Organization of Canada as a futures commission merchant. R.J. O'Brien (UK) Limited is a UK-based, non-regulated company that has acquired an FSA-registered firm, Saxon Asset Management Limited. And RJO Limited is a Hong Kong-based entity that is in the process of registering with the Hong Kong Securities and Futures Commission and Singapore for authorization to deal in futures contracts.

#### General Partner of Vehicle in which Clients are solicited to Invest

The Firm, RJOIM, or an affiliate may act as general partner, managing member or other controlling entity in private investment vehicles that may invest in securities, commodities, real estate or other investments in which RJOIM's clients may be solicited to invest. Absent specific authority, RJOIM does not generally exercise any discretionary authority with respect to a client's decision to invest in such vehicles.

#### **Item 11 – Code of Ethics**

RJOIM has adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at RJOIM must acknowledge the terms of the Code of Ethics annually, or as amended. The Code of Ethics contains policies and procedures that, among other things:

- Require employees to observe fiduciary duties owed to clients.
- Prohibit employees from taking personal advantage of opportunities belonging to clients.
- Prohibit trading on the basis of material non-public information.
- Place limitations on personal trading by employees and impose reporting obligations with respect to such trading.
- Impose limitations on the giving or receiving of gifts and entertainment.
- Restrict employees' outside business activities.
- Prohibit disclosure by employees of confidential information of RJOIM and its clients.

Personal securities transactions by employees are monitored by the Chief Compliance Officer Nancy Westwick and governed by the procedures set forth in the Code of Ethics. A copy of the Code of Ethics is available upon request.

Personnel may, from time to time, invest their own assets in the same securities in which client assets have been invested. In the unlikely event that a fund sets limits on the amount of additional assets that may be accepted for management, RJOIM's clients will be given first priority to invest.

### Trade Errors

As it relates to RJOIM's CM division clients, CM has determined there are two potential types of trade errors that it may encounter, those that are detected after the trade has settled and those that are detected prior to trade settlement. We correct all trade errors once detected.

Trade errors detected after a trade has settled in a client account are considered "Client Account Trade Errors." For Client Account Trade Errors where CM is determined to be at fault, CM will pay any losses resulting from the error. If it is determined that the client is at fault, CM may, in its discretion, pay the loss or charge the loss (in whole or in part) to the client. Net gains incurred if any when correcting a Client Account Trade Error will be retained by the client.

Trade errors that are detected prior to settlement in a client account are considered "Adviser Account Trade Errors." CM if detected will correct Adviser Account Trade Errors, and any correcting trade, into a separate error account. Net gains realized on a correcting trade will be retained by RJOIM and net losses incurred on a correcting trade will be paid by RJOIM. Net gains if any may be retained by RJOIM in the error account or closed out.

As it relates to MFM in its role as investment manager to the Funds, MFM may allocate Fund assets among various other Managers. In these cases, once allocated, MFM does not exercise discretion with respect to the underlying investments purchased by the Managers of the Funds or the brokers they use. Each allocated Manager or Managed Account will have its own method of handling trading errors. Please read carefully the funds offering document for more complete information including, fees, charges, expenses, risk, restrictions and other important information.

### **Item 12 – Brokerage Practices**

RJOIM does not engage in the long-standing practice in the money management industry of acquiring research and brokerage products and services ("research products") from broker-dealer firms in return for directing trades for client accounts to those firms, and subject to Section 28(e) of the Exchange Act.

#### Broker Selection and Trade Execution

As it relates to CM obtaining the best trade execution is an important aspect of every trade that we place in a client account. RJOIM has put in place a Trading Department Oversight Committee ("TDOC") that selects brokers to use to execute trades and determines the reasonableness of their compensation based on a range and quality of a broker's services including execution capability, depth of inventory, reputation, prior working experience, financial strength, and fairness in resolving disputes. However RJOIM is not obligated to select a broker offering the lowest commission rate or security price in connection with any given transaction.

As it relates to MFM, investment discretion is limited to the authority detailed in the Fund's offering documents, as indicated in its role as Manager; MFM evaluates every Manager and Managed Account that we place Fund assets with.

MFM allocates Fund assets among various Managers. In these cases, once allocated, MFM does not exercise discretion with respect to the underlying investments purchased by the Managers of the Funds or the brokers they use.

### Custodians

RJOIM clients may choose to utilize their own independent custodian. In these situations, it is the client's responsibility to negotiate and pay rates to their custodian, including bank custody and wire fees.

### Repurchase agreements

Repurchase agreements are executed through primary dealers willing to collateralize the repurchase agreement at 102% using agency and treasury securities as collateral. RJOIM continually assesses the counterparty risk associated with a broker-dealer when executing repurchase agreements.

### Client Directives

CM's clients impose direct in writing restrictions that require or mandate RJOIM to effect portfolio transactions for their accounts through particular brokers or dealers.\* The client restriction may be conditioned upon the broker or dealer being competitive in net price and execution of each transaction, or may be subject to varying degrees of "restriction" such as an instruction to use the particular broker or dealer that is or is not competitive at net price and execution or at specified commission rates which are less favorable than RJOIM might otherwise obtain.

\* Subject to certain conditions

In the case of a "restricted" designation, CM may execute transactions in fixed-income that may deviate from the client's designation in situations in which, in its judgment, a significantly more advantageous net price is available from another dealer or it may authorize the designated broker-dealer to effect the transaction as agent in order to obtain a better price from another dealer, but allow the designated "agent" broker-dealer a scheduled mark-up or mark-down on the transaction.

Clients sometimes wish to restrict brokerage to a particular broker or dealer in recognition of custodial or other services (including, in some cases, referral of the client to RJOIM for investment advisory services) provided to the client by the broker or dealer. A client that chooses to designate use of a particular broker or dealer on a "restricted" basis, including a client which designates a broker or dealer as custodian of the client's assets, should consider whether such a designation may result in certain costs or disadvantages to the client, either because the client may pay higher commissions than might otherwise be obtainable by RJOIM, or receive less favorable net prices and executions of some transactions, or both.

A client which restricts RJOIM's discretion in choosing brokers and dealers to effect transactions for the client's account may also be subject to the disadvantages described below regarding priority of execution, allocation of new issue purchases, and aggregation of orders. In determining whether to instruct RJOIM to use a particular broker or dealer on a "restricted" basis, the client may wish to compare the possible costs or disadvantages of such an arrangement with the value of the custodial or other services provided.

Clients that restrict brokerage for their accounts may be disadvantaged in obtaining allocations of securities that RJOIM purchases or recommends for purchase in other clients' accounts. Accounts with restricted brokerage are not eligible to participate in new issue offerings, unless the restricted

broker is part of the underwriting syndicate and the shares allocated to that account will be distributed by the restricted broker.

As noted above, it is the practice of RJOIM, when feasible, to aggregate for execution as a single transaction orders for the purchase or sale of a particular security for the accounts of several RJOIM clients, in order to seek a more advantageous net price. The benefit, if any, obtained as a result of such aggregation generally is allocated pro rata among the accounts of clients which participated in the aggregated transaction. However, if a client has restricted transactions to a particular broker or dealer, then the client's account generally is unable to participate in aggregated orders unless executed with the client's designated broker or dealer. If an aggregated transaction is executed with the client's designated broker and the client also has specified a particular commission rate to be paid on transactions, that specification may preclude the client from receiving the benefit, if any, of a lower commission associated with the aggregation, and the accounts of other clients participating in the aggregated order may receive a correspondingly greater benefit.

To execute client orders most efficiently, RJOIM's traders generally assign the lowest priority to execution of orders for client accounts that have restricted brokerage. Accordingly, the execution of orders for accounts which restrict brokerage may be less timely than the execution of orders for other client accounts. This priority of execution may or may not result in any consistent price disadvantage, depending upon the market activity in the security to be purchased or sold.

In the case of MFM, client directives are subject to the Fund's offering documents which may limit the ability of MFM to accept or reject client directives. As indicated in its role as Manager to the Funds, MFM allocates Fund assets among various other Managers and/or Funds. Once allocated, MFM does not exercise discretion with respect to the underlying investments purchased by the Managers and/or Funds or the brokers they use.

#### Conflicts Relating to Principal and Agency Cross Transactions

To the extent permitted by applicable law, RJOIM may enter into transactions and invest in futures, securities, Reverse Repurchase Agreements, CDs, options, forward contracts or other instruments on behalf of Advisory Accounts in which the Firm, acting as a control person of RJOIM, principal, or on a proprietary basis for its self or customers, serves as the counterparty. To the extent permitted by applicable law, Advisory Accounts may also enter into cross transactions (i.e., where RJOIM causes an Advisory Account to buy a security from, or sell a security to, another client of RJOIM or its affiliates) and "agency cross transactions" (i.e., where the Firm acts as broker for, and receives a commission from, both an Advisory Account on one side of the transaction and a brokerage account on the other side of the transaction in connection with the purchase or sale of securities). The Firm may have a potentially conflicting division of loyalties and responsibilities to both parties to a cross transaction or agency cross transaction. For example, in a cross transaction RJOIM or an affiliate will represent both an Advisory Account on one side of a transaction and another Advisory Account on the other side of the transaction (with the possibility that one party in transaction is an account that the Firm has a proprietary interest) in connection with the purchase of a security by the Advisory Accounts from the other. In addition, in an agency cross transaction, the Firm will act as broker and receive compensation or other payments from either or both parties, which could influence the decision of the Firm to cause the Advisory Account to purchase such security. Cross transactions and agency cross transactions are effected on commercially reasonable

arms-length terms. RJOIM will, to the extent required by law, obtain necessary consents prior to entering into principal or agency cross transactions. RJOIM may also, to the extent permitted by applicable law and subject to the Firm's allocation policies, transfer some or all of an Advisory Account's assets to other Client/RJO Accounts, if client request transfer, RJOIM deems it advisable in order to achieve the investment objectives of the Advisory Account, and such Client/RJO Account will benefit.

#### Allocation Policy

CM has a trade allocation policy that allows it to select brokers for accounts where the client has given us full discretion. Trades in discretionary accounts are grouped together and traded first. Directed brokerage accounts, in which the client has directed us to use a specific broker, are grouped together and placed in random order by broker. When a trade is partially completed, the security is allocated on a pro-rata basis to the appropriate client accounts. CM will make its best efforts for all grouped trades are allocated to the participating accounts at average cost.\*

\*See Section Client Directives listed above as it relates to client restrictions and the possible disadvantages on allocation.

As it relates to MFM, allocation is limited to the authority detailed in the Fund's offering documents, as indicated in its role as manager; MFM evaluates every Manager that we place assets with. Once selected, MFM then allocates Fund assets among various Managers and/or Funds. In these cases, once allocated, MFM does not exercise discretion with respect to the underlying investments purchased by the Managers and/or Funds or the brokers they use.

#### **Item 13 – Review of Accounts**

In general, all client accounts are reviewed on a daily basis to reasonably ensure that their balances are invested according to parameters indicated within the client's Investment Advisory Agreement and to verify the accuracy of accounting. RJOIM reconciles with its independent custodian, currently Wells Fargo Bank, on a daily basis all security holdings and cash movements for each client account. Client's accounts are monitored for the client's stated objectives and risk tolerance. All RJOIM client accounts are reviewed at least monthly to insure that transactions:

- Conform to client objectives and investment/restriction guidelines
- Are consistent with available cash in the client's account; and
- Conform to RJOIM and client's agreed to investment strategy.

The firm's accounts are reviewed by any of the following RJOIM employees: the firm's President, Chief Investment Officers, Chief Compliance Officer, Senior Portfolio Managers, Director of Operations. Additionally, certain controls have been built into the company's proprietary computer system software and daily bookkeeping processes to provide multiple checks and balances.

CM currently employs a two tiered process where the portfolio manager responsible for the account reviews the prior day's activity as well as the compliance department. The portfolio manager has sole discretion on investments decisions for client. As part of the firms overall review, the investment committee and compliance department perform an additional quarterly review on client objectives and account holdings. In addition, securities held in CM client accounts are continuously



monitored and reviewed to determine the impact of changes in the yield curve and other market conditions.

MFM as manager of a Fund periodically reviews the Fund's activity. MFM may also utilize the services of a 3<sup>rd</sup> party fund administrator and its associated persons in reviewing the Fund. MFM will also monitor the Fund and investments on an ongoing basis, and provide further recommendations or reports on an as needed basis and/or as requested by the 3<sup>rd</sup> party fund administrator. Please review carefully each Fund's offering documents which list important information including information on the Fund's review process.

#### Nature and Frequency of Reporting to clients

The CM Division provides when available, each client the ability to directly receive electronic access to daily trade activity, account holdings and cash balances and account statements directly from their custodian(s) that reflect account activity and holdings.\* This electronic access which is provided by the custodian is typically available to the client 24/7 via the internet. RJOIM reviews client accounts daily and monthly for activity, holdings, client investment strategy, and during the daily custodian reconciliation process. Such RJOIM reports primarily contain account holdings, security purchase price, and general performance information. The RJOIM daily reports do not reflect the deduction of investment advisory fees but do provide the daily cumulative accrual fee amount. This amount is deducted from the client account balances on the first business day of each month.\*\*

The Information contained in these reports is collected from sources believed to be reliable. However, client should always rely on custodian's statements. Additionally, on a monthly basis, the custodian provides each client a detailed valuation of the individual securities, their cost and market value, and a summary of the total account holdings. The custodian monthly report also includes a transaction history showing each purchase and sale during the period covered. Clients should always refer to the custodian's statement as the primary record reflecting their account holdings and value. If client detects a discrepancy during its reconciliation process they must notify RJOIM immediately.

\* Each Custodian carries their own set of reports and information a client may access electronically. RJOIM uses Wells Fargo as its preferred custodian which provides these services to its discretionary clients.

\*\* RJOIM statements can be tailored to certain client request. Please consult with your portfolio manager to see if the daily and monthly reports can be tailored to your specific requirements.

MFM as manager does not provide reports to any of the Funds, MFM (or a 3<sup>rd</sup> part fund administrator on behalf of MFM) does provide statements directly to the underlying investors of a fund. These statements are provided as least monthly, and include, but are not limited to, capital account activity, beginning and ending capital account balances, net profit or loss, calculated rates of return for the period, as well as fund contact information. Please review carefully each Fund's offering documents which list important information including information on the Fund's reporting to investors.

#### **Item 14 – Client Referrals and Other Compensation**

On occasion RJOIM may enter into a formal referral relationship whereby RJOIM may compensate affiliated persons or 3<sup>rd</sup> party solicitors in return for referrals. RJOIM will perform a due diligence

review of each solicitor before it will enter into a referral relationship. In each instance, a Solicitor Agreement will be executed between RJOIM and the Solicitor. At the time of any recommendation of RJOIM's services, the Solicitor will deliver the then current RJOIM ADV Part IIA as required by the regulations and disclosure of the relationship. Any referral fees paid by RJOIM do not affect the advisory fees clients pay to RJOIM and are not higher than they would otherwise be because of the referral fees paid.

Other Payments and Contributions To the extent allowed under applicable law and RJOIM policies, RJOIM may contribute toward expenses related to educational seminars, training programs, conferences or meals and entertainment incurred by third parties, financial advisors, and firms that use RJOIM as a sub-advisor or include RJOIM on a list of recommended advisors (including consultants). RJOIM may also pay travel and lodging expenses relating to financial advisor's attendance at RJOIM due diligence meetings. RJOIM may choose to make charitable contributions, or underwrite or sponsor charitable events at the request of others, including those who may be affiliated with clients or program sponsors or consultants that may refer clients to RJOIM. In addition, RJOIM may from time to time buy from third parties certain services or products used in RJOIM's investment advisory business (such as research services) or pay registration or other fees toward or otherwise assist in sponsoring such parties' industry forums, seminars or conferences. Such contributions and payments are paid out of RJOIM's own resources.

The amount of such payments and the value of such items and benefits may or may not be substantial. These payments, items and benefits could give firms and their personnel incentives to favor RJOIM investment management services and other RJOIM affiliated investment products and services over those of investment management firms that do not provide the same payments, items, or benefits. However, such payments are subject to internal policies that address and in some cases, limit such payments with the overall aim to avoid compromising advice or recommendations given by clients by special incentives or compensation arrangements.

### **Item 15 – Custody**

CM Clients should receive at minimum monthly statements from their custodian that holds and maintains client's assets. RJOIM urges you to carefully review such statements and compare such official custodial records to the account statements that we may provide to you. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities. If client does not receive their custodian statement or detects a discrepancy during its reconciliation process they must notify RJOIM immediately. In addition if you don't review your custodian's statement timely you may not be able to determine if an error has occurred

CM recommends the use of Wells Fargo Bank custodial services with a primary emphasis placed upon financial strength, customer service and technological capabilities. However, CM will entertain any client's custodian relationship absent a legal or regulatory objection.

MFM as manager of an RJO Fund, utilize the services of a 3<sup>rd</sup> party fund administrator and its associated persons in managing the funds assets as it relates to transfers, distributions, debits, charges, fees, expenses, and capital additions. In addition the Fund's assets are custodied by an independent unrelated third party. MFM will monitor the Fund and investments on an ongoing

basis or as requested by the 3<sup>rd</sup> party fund administrator. The third party administrator will be the only source for making asset transfers to the selected Manager and/or Managed Account as selected by MFM. Please review each Fund's offering documents which list additional information on each Fund's operations and other important information.

#### **Item 16 – Investment Discretion**

From the outset of an advisory relationship, RJOIM is generally authorized by clients to select the securities and amount of those securities to be purchased and sold in the clients account. For many accounts, RJOIM is authorized to select the brokers and dealers used to execute orders. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. In addition, RJOIM may assist as directed by client in writing to transfer funds to meet an obligation or make a 3<sup>rd</sup> party payment. When selecting securities and determining amounts, RJOIM observes the investment policies, limitations and restrictions of the clients for which it advises. For each client, there will be further differentiation in securities purchased due to liquidity needs. Every client account contains a liquidity portion.

When a client contributes additional capital to its account, RJOIM generally initially adds to the liquidity portion of such client's account. Likewise, when capital is withdrawn, RJOIM generally pays the withdrawing client in cash derived from the liquidity portion of such client's account. In the event of large withdrawals, including full withdrawals by a client where the liquidity portion of such client's account is insufficient to pay the withdrawal amount, RJOIM will sell securities at the prevailing market price for such securities, from such client's account, either in the market or, in limited circumstances, potentially to another client account. From the outset of an advisory relationship Investment guidelines and restrictions must be provided to RJOIM in writing.

As it relates to MFM's investment discretion, it is limited to the authority detailed in the Fund's offering documents, and to the value of the Fund and its respective liquidity. As indicated above, in its role as Manager to the Fund, MFM allocates Fund assets among various other Managers and/or Funds. Once allocated, MFM does not exercise discretion with respect to the underlying investments purchased by the Managers.

#### **Item 17 – Voting Client Securities**

RJOIM's current advisory services do not involve securities that require shareholder voting. However, if in the future this would change, RJOIM would adopt policies and procedures designed to prevent conflicts of interest from influencing proxy voting decisions that it makes on behalf of advisory clients, including the Advisory Accounts, and to help ensure that such decisions are made in accordance with RJOIM's fiduciary obligations to its clients. Nevertheless, notwithstanding such proxy voting policies and procedures, actual proxy voting decisions of RJOIM would most likely have the effect of favoring the interests of other clients, the Firm and/or its affiliates, provided that RJOIM believes such voting decisions to be in accordance with its fiduciary obligations.

**Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about RJOIM's financial condition. RJOIM has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding.

## Firm Brochure Supplement

(Part 2B of Form ADV)

Eric G. Gurdian

Annette A. Cazenave

Mark T. Clements

RJ O'Brien Investment Management, LLC  
222 Riverside Plaza Suit 900  
Chicago, IL 60603  
(312)-373-4960  
03-31-2012

### Item 1 Cover Page

#### **Purpose of the Brochure Supplement:**

This Brochure Supplement provides information about Eric Gurdian that supplements

R.J. O'Brien Investment Management, LLC's firm brochure document. You should have already received a copy of the firm's brochure document. Please contact Nancy Westwick at 312-373-5215 or [nwestwick@rjobrien.com](mailto:nwestwick@rjobrien.com) if you have not received a copy of RJ O'Brien Investment Management, LLC's firm brochure document or if you have any questions about the contents about this Brochure Supplement.

Additional information about Eric Gurdian, Mark Clements, and Annette Cazenave is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov) ( the CRD number for Eric G. Gurdian is #3111513, Mark Clements is #2648697, and Annette Cazenave is #1720683 )

#### **Note:**

While R.J. O'Brien Investment Management, LLC may refer to itself as a "registered investment advisor" or "RIA" Clients should be aware that registration itself does not imply any level of skill or training.

## **Item 2 Educational Background and Business Experience**

**Eric G. Gurdian** (b. 1964)

**Chief Investment Officer, Cash Management Division, RJ O'Brien Investment Management, LLC**

### **Education**

B.S., Millikin University, 1986

### **Business background**

Chief Investment Officer, Cash management Division, of R.J. O'Brien Investment Management LLC , and the Treasurer for R.J. O'Brien Holdings Corporation since October, 2010

Prior to joining R.J. O'Brien he served as the North American Treasurer for MF Global for three years as well as holding a key role on the Board appointed Investment Committee

From 1997 to 2007 he was the Global Treasurer for Calyon Financial directing the investments and treasury operations for the firm as well as holding the position as Manager, Asset and Liability Committee (ALCO)

He began his career at Northern Trust in 1986 and then procured positions in the funding departments of two Japanese banks in Chicago, Long Term Credit Bank (1988-1994) and Sanwa Bank (1994-1997) where he headed the funding desk for both firms prior to his departure

He also held the role of Chief Customer Dealer for foreign exchange at Sanwa Bank.

**Annette A. Cazenave** (b 1965)

**Chief Executive Officer, RJ O'Brien Investment Management LLC**

**Chief Investment Officer, Mutual Fund Division, RJ O'Brien Investment Management LLC**

### **Education**

B.A. from Drew University

M.B.A. in International Management from Thunderbird, School of Global Management

### **Business background**

30 years of comprehensive experience in alternative asset management (specifically managed futures and derivatives) marketing and business management to her position. Specifically, she has been responsible for overall management of R.J. O'Brien Alternative Asset Management and its subsidiary, R.J. O'Brien Fund Management, a registered CPO, since November 2006.

Prior to joining RJO Ms. Cazenave had become SVP of Refco Commodity Management following Refco's acquisition of CIS Investments ("CISI", a division on Cargill Investor Services "CIS"). Ms Cazenave served as Vice President of CISI and head of CIS' Investor Products Group

Previously, she was President and Principal of Skylark Partners, Inc., in New York, a financial services consulting firm dedicated to the development of alternative investment products tailored to institutional and high net worth individuals. Additionally, Ms. Cazenave held senior level positions with ED&F Man Funds Division (now Man Investments) in New York (1986-1993) and E.D. & F.

Man International Securities, where she focused on new product development, distribution, strategic planning and business development. Ms Cazenave started her career in 1979 as a Sugar Trading assistant with Farr Man & Co

**Mark T. Clements** (b. 1973)

**Senior Portfolio Manager, Cash Management Division, RJ O'Brien Investment Management LLC**

### **Education**

B.S. in Finance from University of Dayton 1996

### **Business background**

Was named Senior Portfolio Manager of RJO Investment Management LLC in May 2010. In addition to his title of Senior Portfolio Manager, Mr. Clements has held the title of Asset/Liability Manager of RJO Investment Management since September 2008.

Prior to joining RJO Investment Management, Mr. Clements was self-employed as a real estate investor from August 2006 until September 2008.

From August 1997 until July 2006 Mr. Clements worked for Horizon Cash Management LLC. Mr. Clements held the title of Vice President and Senior Portfolio Manager.

### **Item 3 Disciplinary Information**

None of the individuals listed have had any legal or regulatory disciplinary events in their past. Clients and prospective clients can view the CRD records (Registration Records) for the listed individuals through the SEC's Investment Advisor Public Disclosure (IAPD) website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov) or FINRA's broker check database online at [www.finra.org/brokercheck](http://www.finra.org/brokercheck). The CRD numbers for the following individuals are:

Eric G. Gurdian is #3111513,

Mark Clements is #2648697,

Annette Cazenave is #1720683

### **Item 4 Other Business Activities**

In addition to being investment advisor representatives (hereafter "IA Reps") of RJ O'Brien Investment Management, ("RJOIM") the listed individuals are associated with the RJ O'Brien family of entities of which is ultimately held by RTS Investor Corp. ("the Firm"). The Firm which is a worldwide holding company encompassing a full-service FCM, broker-dealer, asset management and variety of financial services organization, and a agency broker in global financial markets. As such, the individuals may acts as an officer, investment manager, advisor, agents, director, representative, trustee, member, and may have other direct and indirect interests, in the global fixed income, currency, commodity, equity, and other markets in which accounts, including registered and non-registered funds, sponsored, managed or advised by RJOIM ("Advisory Accounts") directly and indirectly invest.

These activities and interests also include potential multiple advisory, transactional and financial and other interests with consultants and distributors who may advise in the opening of Advisory Accounts. Such additional businesses and interests may give rise to potential conflicts of interest of which investors should be aware and which may cause conflicts that could disadvantage the Advisory Accounts.

Certain principal executive officers of RJOIM (including, but not limited to, the Chief Executive Officer, Chief Investment Officer, and Director of Fund Management ) provide management, financial, operational and services to affiliates of RJOIM. Each of the principal executive officers identified above devote the majority of their time to providing management, financial, operational and compliance services to R.J. O'Brien & Associates, LLC, a federally-registered Futures Commission Merchant.



## **Item 5 Additional Compensation**

Aside from the sales commissions paid by fund companies to the individuals (see the “Other Business Activities” section above), None of the individuals receive additional compensation from non clients for providing advisory services. All advisory compensation is paid by clients directly.

## **Item 6 Supervision**

As Chief Executive Officer of RJ O’Brien Investment Management (“RJOIM”), Annette Cazenave is primarily responsible for the supervision of RJOIM and its IA reps. As Ms. Cazenave is an IA Rep herself, her accounts are also reviewed by the Chief Compliance Officer Nancy Westwick.

All advisory contracts and recommendations are reviewed by both the Compliance Department and the Investment Committee before the account is accepted. Once accepted the account is monitored and reviewed daily, monthly, and quarterly.

For portfolio recommendations or changes all transactions are reviewed at the end of the day by the trading department and T+1 by the compliance department. All RJOIM Access individuals are required to participate in RJOIM’s Code of Ethics program. This program requires all Access individuals to provide duplicate copies of their outside securities accounts including immediate family members. The compliance department under Nancy Westwick reviews and evidences these statements to monitor for Code violations or potential conflicts.