

This brochure provides information about the qualifications and business practices of Equinox Fund Management, LLC. If you have any questions about the contents of this brochure, please contact us at: (303) 837-0600, or by email at: [invest@equinoxfundmanagement.com](mailto:invest@equinoxfundmanagement.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.

# Form ADV Part 2A



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Registration of an Investment Advisor does not imply any level of skill or training. The oral and written communications of an Advisor provide you with information which may determine whether to hire or retain an Advisor.

Additional information about Equinox Fund Management, LLC is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov)

March 31, 2013



## Material Changes

### **Annual Update**

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

### **Material Changes Since the Last Update**

Equinox Financial Group, LLC, an indirect owner of Equinox Fund Management, announced the expansion of its portfolio management team with the acquisition of Tapestry Asset Management, LP ("Tapestry"), an investment advisor specializing in the construction, implementation and monitoring of multi-manager hedge fund portfolios and managed futures strategies.

Equinox Fund Management launched the Equinox Alternative Strategy Platform ("EASP"), a platform of single Commodity Trading Advisor ("CTA") program alternative investment mutual funds. EASP is detailed below.

### **Full Brochure Available**

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: (303) 837-0600 or by email at: [invest@equinoxfundmanagement.com](mailto:invest@equinoxfundmanagement.com).

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# Advisory Business

## Firm Description

Equinox Fund Management, LLC (“Equinox”) was founded in 2003 as a Delaware Limited Liability company and became registered as an investment advisor registered with the U.S. Securities and Exchange Commission (“SEC”) under the Investment Advisors Act of 1940 in May, 2007. In addition to being a federally-registered investment advisor, Equinox is a commodity pool operator, or CPO, and is regulated by CFTC and NFA.

Equinox is a leader in the alternative investments industry that believes in the value of non-traditional funds to potentially reduce volatility and enhance returns in portfolios. We are committed to providing innovative, institutional-quality investment solutions that are unique in structure and availability, and outperform relevant benchmarks and competitors. As the investment advisor for the Equinox Family of Funds, Equinox strives to provide the utmost level of customer service and education to our selling partners. Our products are structured to allow access to the broadest group of both accredited and non-accredited investors in the United States.

### *MutualHedge Frontier Legends Fund*

Equinox serves as the investment advisor for MutualHedge Frontier Legends Fund, a 1940 Act fund, offered through Northern Lights Fund Trust, a mutual fund family that offers separate investment portfolios. MutualHedge Frontier Legends Fund seeks to achieve capital appreciation in both bull and bear equity markets with an annual volatility that is generally lower than the volatility experienced by the S&P500® Index. The fund invests in a combination of derivatives and fixed income securities.

### *Equinox Commodity Strategy Fund*

Equinox serves as the investment advisor for Equinox Commodity Strategy Fund, a 1940 Act fund, offered through the Equinox Funds Trust, a mutual fund family that offers separate investment portfolios.

### *Equinox Alternative Strategy Platform*

The Equinox Alternative Strategy Platform is a platform of single Commodity Trading Advisor (“CTA”) program alternative investment mutual funds. Designed to provide

exposure to CTA programs, the platform combines Equinox’s product development expertise and knowledge of the trading managers featured. Seeking daily liquidity and 1099 tax reporting, the platform applies an institutional approach to a familiar, regulated structure. The Equinox Alternative Strategy Platform represents liquid and transparent alternative investment strategies, and a broader application of Equinox’s capabilities to serve some investors.

## Principal Owners

Plimpton Capital, LLC is the principal owner of Equinox. Plimpton Capital is owned by Equinox Financial Group, LLC and The Estate of John Plimpton. Equinox Financial Group, LLC is 100% owned by Scan Partners, Ltd. which is managed by Caroline Monaghan Pallat as trustee.

## Types of Advisory Services

### *As Investment Advisor to the Equinox Family of Funds:*

Equinox manages and supervises the investment of the Funds’ assets on a discretionary basis and is committed to providing prudent investment strategies designed to meet the stated objectives of each fund. Equinox designs portfolios that are uniquely structured for each fund.

As of March 19, 2013, Equinox Fund Management, LLC manages approximately \$824,152,430 in assets for eleven fund clients, all on a discretionary basis.

## Tailored Relationships

Given the nature of Equinox’s investment advisory activities and the fact that its clients are institutional (mutual funds), it will not provide investment advisory services to or have an advisory relationship with individuals.

Investment policy statements are created that reflect the stated goals and objective of each client fund. The Client Fund may impose restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

## Types of Agreements

The following agreements define the typical client relationships.

## Investment Management Agreement

Equinox will provide advisory services to clients only upon the execution of a Written Agreement between Equinox and the client.

Clients retain Equinox to implement strategies that allocate a portion of the client's investment portfolio to professional Commodity Trading Advisors who participate in the futures, options and foreign exchange markets. In performing these services, Equinox identifies leading Commodity Trading Advisors and then constructs multi-advisor portfolios designed in accordance with the client's specified risk parameters and investment objectives. Each potential Trading Advisor undergoes strict quantitative and qualitative review by Equinox. Trading Advisor selection is based upon many factors which include the Advisor's investment strategy, trading activity, volatility, portfolio composition, account leverage and Risk-Reward ratio.

Depending upon the redemption provisions, the client may be able to withdraw a portion or all of their allocation within one day. Although the Investment Supervisory Agreement is an ongoing agreement and continual adjustments may be likely, under normal conditions, the client would need to give a thirty (30) day prior written notice in order to terminate the investment advisory contract with Equinox. If the investment advisory contract is terminated other than at the end of the calendar quarter, the management fee will be prorated.

## Hourly Planning Engagements

Equinox Fund Management, LLC does not provide hourly planning services for clients who need advice on a limited scope of work.

## Termination of Agreement

A client may terminate any of the aforementioned agreements at any time by notifying Equinox Fund Management, LLC in writing.

Under normal conditions, the client would need to give a thirty (30) day prior written notice in order to terminate the investment advisory contract with the applicant. If the investment advisory contract is terminated other than at the end of the calendar quarter, the management fee will be prorated.

# Fees and Compensation

## Description

Equinox Fund Management, LLC bases its fees on a percentage of assets under management and other fees as explained below.

## Fee Billing

For advisory services provided to the MutualHedge Frontier Legends Fund, Equinox will receive a percentage of assets under management at an annual rate of 1.45%. The advisor has contractually agreed to waive its management fees and/or to make payments to limit Fund expenses, until May 31, 2014 so that the total annual operating expenses (including the Advisory fee, any Rule 12b-1 fees and other expenses described in the Investment Advisory Agreement, but exclusive of any front-end or contingent deferred loads, brokerage fees and commissions, acquired fund fees and expenses, borrowing costs (such as interest and dividend expense on securities sold short) taxes or extraordinary expenses such as litigation) of the Fund do not exceed 1.86% for Class A shares, 2.61% for Class C shares and 1.61% for Class I shares. These fee waivers and expense reimbursements are subject to possible recoupment from the Fund in future years on a rolling three year basis (within the three years after the fees have been waived or reimbursed) if such recoupment can be achieved within the foregoing expense limits. This agreement may be terminated only by the Fund's Board of Trustees, on 60 days written notice to the advisor.

For advisory services provided to the Equinox Commodity Strategy Fund, Equinox will receive a percentage of assets under management at an annual rate of 1.35%. The Advisor has contractually agreed to reduce its advisory fee and/or reimburse certain expenses of the Fund to the extent necessary to ensure that the Fund's total operating expenses (excluding any interest, Trading Company expenses, extraordinary items, "Acquired Fund Fees and Expenses" and brokerage commissions) do not exceed 1.78% of average daily net assets for Class A shares, 2.53% of average daily net assets for Class C shares, and 1.53% of average daily net assets for Class I shares (on an annual basis) (the "Expense Limitation"). The Expense Limitation will remain in place until January 28, 2014, unless the Board of Trustees of Equinox Funds Trust

(the “Trust”) approves its earlier termination. The Advisor is entitled to recoup, subject to approval by the Board of Trustees, such amounts reduced or reimbursed for a period of up to three (3) years from the year in which the Advisor reduced its compensation and/or assumed expenses for the Fund. No recoupment will occur unless the Fund’s expenses are below the Expense Limitation.

For advisory services provided to the Equinox Abraham Strategy Fund, Equinox Absolute Return Strategy Fund, Equinox Campbell Strategy Fund, Equinox Chesapeake Strategy Fund, Equinox Crabel Strategy Fund, Equinox Eclipse Strategy Fund, Equinox John Locke Strategy Fund, Equinox QCM Strategy Fund, and the Equinox Tiverton Strategy Fund; Equinox will receive a percentage of assets under management at an annual rate of 0.75%. The Advisor has contractually agreed to reduce its advisory fee and/or reimburse certain expenses of the Fund, to ensure that the Fund’s total annual operating expenses, excluding (i) taxes, (ii) interest, (iii) extraordinary items, (iv) “Acquired Fund Fees and Expenses,” (v) any expenses of the Subsidiary including trading company expenses, (vi) any class specific fees and expenses, and (vii) brokerage commissions, do not exceed, on an annual basis, 1.10% of the Fund’s average daily net assets. The Advisor has contractually agreed to reduce its fees and/or reimburse expenses of the Fund until at least January 31, 2014. This agreement may be terminated only by the Fund’s Board of Trustees on 60 days’ written notice to the Advisor. The Advisor shall be entitled to recover, subject to approval by the Board of Trustees of the Trust, such waived or reimbursed amounts for a period of up to three (3) years from the year in which the Advisor reduced its compensation and/or assumed expenses for the Fund. The Advisor is permitted to seek reimbursement from the Fund, subject to certain limitations, for fees it waived and Fund expenses it paid to the extent the total annual fund operating expenses do not exceed the limits described above or any lesser limits in effect at the time of reimbursement. The amount of the fee waiver/expense reimbursement shown is an estimate based on expenses estimated for this fiscal year.

The management fee for all Equinox funds is billed monthly in arrears based upon daily accruals in an amount determined by applying the annual rate, divided by 365 (or 366) days to the net asset value of all accounts subject to the Investment Management Agreement. Mutual Fund clients authorize the deduction of fees directly from the appointed custodian, i.e. the broker-dealer, clearing firm, trust company or authorized institution maintaining the account. The custodian will then remit the applicable fees to the Company. Fees are negotiable only under special circumstances. Lower fees for comparable

services may be available from other sources. Equinox is not a sponsor of a wrap program.

## Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Equinox Fund Management, LLC, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

New Advisory Management Agreement fees are calculated on a formula basis and adjusted for complexity of individual situations. The formula is based on gross income, gross assets and other financial considerations.

## Expense Ratios

The line of the fee table in the Prospectus that represents the total of all a mutual fund’s annual fund operating expenses is expressed as a percentage of the fund’s average net assets.

## Termination of Agreement

## Sharing of Capital Gains

The applicant does not presently intend to charge any incentive fees with respect to securities investment advice rendered by the applicant to clients. In the event that, in the future, the applicant decides to charge advisory fees with respect to such securities investment advice, such fees will be calculated and charged in compliance with the Investment Advisors Act of 1940, as amended, and the rules promulgated thereunder including Rule 205-3.

## Types of Clients

### Description

Equinox's clients are institutional and funds for which it acts as an investment advisor and general partner and may provide advice regarding investments strategies utilizing portfolio management techniques.

Equinox will act as the investment advisor and general partner to its clients.

Client relationships vary in scope and length of service.

### Account Minimums

Equinox may implement minimum account sizes.

## Methods of Analysis, Investment Strategies, and Risk of Loss

### Methods of Analysis

A combination of fundamental and charting techniques using internal and outside research service will allow the applicant to identify attractive sectors and styles of various markets in order to allocate fund assets. The applicant's securities analysis utilizes computerized software programs which apply a number of statistical measures in addition to various asset allocation principles.

### Investment Strategies

#### *MutualHedge Frontier Legends Fund:*

Seeks to achieve capital appreciate in both rising and falling (bull and bear) equity markets with an annualized level of volatility similar to the historic level of volatility similar to the historic level of volatility experienced by the S&P Index.

Aims to provide the investment return of a portfolio of event-driven hedge funds selected by Equinox Fund Management, LLC (the "Advisor") that are otherwise not available to retail investors.

#### *Equinox Commodity Strategy Fund:*

The Fund is designed to achieve investment results similar to the performance of a reference index. The reference index follows a long/short, market neutral investment strategy which tracks a deemed-long position and a deemed-short position in futures contracts of three main commodity sectors: energy, industrial metals and agriculture. The reference index increases or decreases based on the performance of these deemed investments and the relationship between a specific target volatility and the volatility of the aggregate value of the deemed investments. In general, the strategy underlying the reference index seeks to take advantage of potential inefficiencies in the rolling mechanism employed by the commodity indices in which an underlying index (the "Underlying Index") takes a short position. The Underlying Index is comprised of (i) a long position in each of an energy, agriculture and industrial metals index and (ii) a short position in each of an energy, agriculture and industrial metals index. At the same time, the Reference Index stabilizes potential returns by attempting to control the volatility of the reference index near to a 6% target.

#### *Equinox Alternative Investment Platform:*

##### **Equinox Abraham Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Abraham Trading Company ("ATC").

##### **Equinox Absolute Return Plus Strategy –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Mesirow Financial Commodities Management, LLC ("Mesirow").

##### **Equinox Campbell Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Campbell & Company.

##### **Equinox Chesapeake Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Chesapeake Capital Corporation ("Chesapeake").



**Equinox Crabel Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Crabel Capital Management, LLC (“Crabel”).

**Equinox Eclipse Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Eclipse Capital Management, Inc. (“Eclipse”).

**Equinox John Locke Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by John Locke Investments (“John Locke”).

**Equinox QCM Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Quality Capital Management, Ltd (“QCM”).

**Equinox Tiverton Strategy Fund –**

The Fund seeks to achieve long-term capital appreciation through exposure to one or more managed futures trading programs offered by Tiverton Trading Company (“Tiverton”).

As of March 19, 2013, Equinox Fund Management, LLC manages approximately \$824,152,430 in assets for eleven fund clients, all on a discretionary basis.

**Risk of Loss**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment’s originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business’ operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

***How We Manage Risk***

To ensure that investment objectives are being achieved within stated risk parameters, Equinox monitors leverage, volatility, market sector exposure, losses from peak profit levels, and frequency of trading activity.

Equinox is subject to the requirements of Section 404 of the Sarbanes Oxley Act relating to management’s certification of, and its auditors attesting to, the effectiveness of the fund’s internal control over financial reporting.

Financial statements are audited annually by an independent registered public accounting firm, McGladrey & Pullen, LLP, the fifth largest auditing firm in the U.S.



## Disciplinary Information

### Legal and Disciplinary

Equinox, its management persons and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

## Other Financial Industry Activities and Affiliations

### Financial Industry Activities

Equinox Fund Management, LLC is not registered as a securities broker-dealer, a futures commission merchant, or commodity trading advisor, nor does it have an application pending for registration as a securities broker-dealer, or a futures commission merchant, or commodity trading advisor.

### Affiliations

Equinox Fund Management, LLC has arrangements that are material to its advisory business or its clients with a related person who is a broker-dealer, investment company, other investment advisor, commodity pool operator, commodity trading advisor or futures commission merchant—

Equinox is registered as a Commodity Pool Operator (“CPO”). Equinox acts as Managing Owner for The Frontier Fund (“TFF”) a SEC ‘34 Act public managed futures fund that was formed on August 8, 2003, under the Trust Act and had \$484,720,700 million under management as of March 19, 2013.

Equinox may have additional clients other than MutualHedge and Equinox Fund Trust funds in its capacity as an investment advisor and is the CPO for The Frontier Fund. Equinox currently does not sponsor any other commodity pools or commodity funds. Mr. Richard Bornhoft is affiliated with The Bornhoft Group, which currently is the general partner/managing owner and commodity pool operator of non-public commodity funds.

Equinox is an affiliate of Equinox Group Distributors, LLC (“EGD”) which is registered with FINRA as a securities broker-dealer. Some associated persons of Equinox are affiliated with EGD and, as such, can buy or sell securities for clients through EGD. Representatives may receive commissions due to such securities transactions. Clients should be aware that such services may be available elsewhere at a lower cost and are under no obligation to use Equinox Group Distributors, LLC.

Equinox Financial Group, LLC, an indirect owner of Equinox Fund Management, announced the acquisition of Tapestry Asset Management, LP (“Tapestry”), an investment advisor specializing in the construction, implementation and monitoring of multi-manager hedge fund portfolios and managed futures strategies. Tapestry changed its legal name to Equinox Institutional Asset Management (“EIAM”) on March 1, 2013 and is an affiliate of Equinox under common control.

**The Frontier Fund (“Frontier”)** is a family of managed futures funds, sponsored by Equinox Fund Management, LLC. Frontier’s managed futures funds are publicly available to non-accredited investors in most states. Frontier is offered through many of the largest and most prominent Broker Dealers in the United States, as well as through independent investment advisors, and is on several institutional platforms.

**MutualHedge Frontier Legends Fund** is a portfolio of actively managed CTA programs in the structure of a mutual fund. Advised by Equinox Fund Management, LLC, MutualHedge is publicly available to retail investors in all states.

**Equinox Commodity Strategy Fund** is a mutual fund advised by Equinox that seeks to attain appreciation in the commodities markets.

### *Equinox Alternative Strategy Platform*

The Equinox Alternative Strategy Platform is a platform of single Commodity Trading Advisor (“CTA”) program alternative investment mutual funds. Designed to provide exposure to CTA programs, the platform combines Equinox’s product development expertise and knowledge of the trading managers featured. Seeking daily liquidity and 1099 tax reporting, the platform applies an institutional approach to a familiar, regulated structure. The Equinox Alternative Strategy Platform represents liquid and transparent alternative investment strategies, and a broader application of Equinox’s capabilities to serve some investors.

There are no limitations on Equinox's authority to determine the matters set forth in Section 12 (A) and (B) of Part II. In selecting brokers, applicant considers the full range and quality of the broker's services, including among other things, execution capability, financial stability, quality of service and commission rates.

## Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

### Code of Ethics

A Code of Ethics has been adopted by Equinox that establishes minimum standards for ethical business practices. It applies to all employees of Equinox, whether established or on temporary contracts. Consultants or agents who are retained to represent the Company are also required to conform to the relevant sections of this code.

The Code identifies a number of basic principles that guide our business practices and conduct. These are the ethical principles on which the Code has been based::

- We must always conduct our business with the highest level of honesty, professionalism and ethical conduct. This high standard must be followed in dealing with employees, business partners, outside agencies, regulatory bodies and clients. Further, we must follow this standard in our handling of actual or apparent conflicts of interest between personal and professional relationships.
- We must strive for full, fair, accurate, timely and understandable disclosure in reports and documents that a registrant files with, or submits to, the Securities and Exchange Commission ("SEC"), the Financial Industry Regulatory Authority ("FINRA"), the National Futures Association ("NFA"), the Commodity Futures Trading Commission ("CFTC"), and other regulatory bodies as well as in our public communications made by the Company.
- We must fully comply with applicable laws, governmental rules and regulations.
- We must make every effort to continuously improve and

uphold our good reputation with customers and business partners and seek to ensure that investors in our funds are treated fairly and appropriately with every interaction.

- Our entire team must constantly seek to encourage an environment of mutual respect, openness and integrity in the workplace. Further, we encourage every member of the team, at all levels in the organization to foster a spirit of teamwork, entrepreneurial energy and enthusiastic client focused activities that resonate to all involved our commitment to excellence and our higher ethical standard.

The employees of Equinox Fund Management, LLC have committed to a Code of Ethics that is available for review by clients and prospective clients upon request. The firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

### Participation or Interest in Client Transactions

Equinox may recommend to its clients to buy or sell securities or investment products in which it has a financial interest.

From time to time, Equinox or one of its associates may recommend to clients to buy or sell securities or investment products in which it has some financial interest. However, Equinox has adopted policies and procedures to avoid potential conflicts of interest to the detriment of its clients:

- The Firm's CCO will monitor the personal securities transactions of Equinox associates to ensure that such persons are fulfilling their fiduciary responsibilities to Equinox's clients.
- In addition to monitoring securities transactions, the CCO will take all reasonable steps to determine that all associates of Equinox comply with certain restrictions regarding a) Pre-clearance of certain Securities Transactions; b) Black-Out Periods; c) Short Term Trading; and, d) Active Trading by Advisory Representatives for their own Accounts; and, e) filing Quarterly Personal Securities Trading Reports:
- Although Equinox Fund Management, LLC and its employees may buy or sell securities that are also held by clients, employees may not trade their own securities ahead of client trades.
- Employees must comply with the provisions of Equinox Fund Management, LLC Compliance Manual.

## Personal Trading

The Chief Compliance Officer of Equinox Fund Management, LLC is Jason Gerb. He reviews all employee trades each quarter. His trades are reviewed by Frank Codey, Chief Operating Officer. The personal trading reviews ensure that the personal trading of employees does not affect the markets, and that clients of the firm receive preferential treatment. Since most employee trades are small mutual fund trades or exchange-traded fund trades, the trades do not affect the securities markets.

## Brokerage Practices

### Selecting Brokerage Firms

As mentioned previously, Equinox has a relationship with its affiliate, Equinox Group Distributors, LLC which is registered as a securities broker-dealer, under common control. Associated persons of Equinox may be affiliated with Equinox Group Distributors, LLC a FINRA registered Broker/Dealer. As such, representatives of Equinox can buy or sell securities for clients through Equinox Group Distributors, LLC. Representatives may receive commissions due to such securities transactions. Clients should be aware that such services may be available elsewhere at a lower cost and are under no obligation to use Equinox Group Distributors, LLC. Equinox Fund Management, LLC may recommend custodians based on the proven integrity and financial responsibility of the firm and the best execution of orders at reasonable commission rates.

Equinox Fund Management, LLC does not receive fees or commissions from any of these arrangements.

### Directed Brokerage

If a client directs Equinox to use a particular registered representative or brokerage firm, such instructions must be in writing. The client may at any time change such instructions by giving written notice to Equinox. It is the responsibility of the account manager to advise the client in writing that as a result of such brokerage, client may pay a higher brokerage commission than might otherwise be paid if Equinox had been granted discretion to select a broker to handle the client's account. If a client directs Equinox to use a particular registered representative or brokerage firm, the client will be advised that Equinox may be unable to bunch, block or aggregate his/her trades with those of other clients. The

inability to bunch trades may result in the client's trades being executed at a price different from trades that are bunched and which may be less favorable.

### Best Execution

Equinox Fund Management, LLC conducts reviews of trade executions periodically. The specific parameters of these reviews are documented in Equinox Fund Management, LLC IA Manual. Trading fees charged by the custodians are also reviewed on a quarterly basis. Equinox Fund Management, LLC does not receive any portion of the trading fees.

### Soft Dollars

Equinox Fund Management, LLC does not receive research or other products or services other than execution services from a broker/dealer or a third party in connection with our clients' securities transactions ("soft dollar benefits").

### Order Aggregation

The portfolio managers of Equinox may for a number of reasons, bunch, block or aggregate brokerage orders for their clients rather than execute individual transactions for each account. These reasons include: (1) obtaining lower commission rates; (2) avoiding the time and expense of simultaneously entering similar orders for many individual client accounts that are managed similarly; (3) ensuring that all accounts managed in a particular style obtain the same execution to minimize differences in performance and (4) obtaining a better execution price even though the commission rate may be higher than the lowest rate otherwise available.

## Review of Accounts

### Periodic Reviews

On a daily to weekly basis client accounts are reviewed by Richard Bornhoft and other members of the investment committee. Triggering factors for the reviews include performance for each of the individual Commodity Trading Advisors assigned to any given client as well as the performance of the overall client account. Included in the performance factors are current, month to date, and life to date returns, margin to equity usage, market participation, and Commodity Trading Advisors' performance within client accounts compared to other accounts traded by the Commodity Trading Advisor. Mr. Bornhoft is a principal of

Equinox. Parameters regarding the reviews are detailed in the client agreement. Each reviewer is assigned to review only up to the maximum number of reports as is practicable.

## Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

## Regular Reports

The applicant will distribute written reports to clients on their accounts on a quarterly or more frequent basis. Each report will review the account's performance for the preceding quarter and year-to-date. Each report will discuss any adjustments that have been made to the client's account.

# Client Referrals and Other Compensation

## Incoming Referrals

The firm does not engage solicitors to solicit business on our behalf or compensate referring parties for referrals.

## Referrals Out

Equinox Fund Management, LLC does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

## Other Compensation

Equinox Fund Management, LLC does not receive any other form of compensation.

# Custody

## Account Statements

All assets are generally held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly.

## Performance Reports

Clients are urged to compare the account statements received directly from their custodians to performance reports provided by Equinox Fund Management, LLC.

## Net Worth Statements

Given the nature of Equinox's business, net worth statements are not provided to its clients.

# Investment Discretion

## Discretionary Authority for Trading

As an Investment Advisor to The MutualHedge Frontier Legends Funds, the Equinox Commodity Strategy Funds, and the Equinox Alternative Strategy Platform; Equinox manages and supervises the investment of the Funds' assets on a discretionary basis and is committed to providing prudent investment strategies designed to meet the stated objectives of each fund. Equinox designs portfolios that are uniquely structured for each fund.

## Limited Power of Attorney

Given the nature of Equinox's business activities, it does not execute Limited Power of Attorney for clients.

# Voting Client Securities

## Proxy Votes

Equinox Fund Management, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is requested, Equinox Fund Management, LLC personnel may answer client questions regarding proxy voting matters in an effort to assist the client in determining how to vote the proxy. However, the final decision of how to vote the proxy rests with the client.

## Financial Information

### Financial Condition

Equinox Fund Management, LLC does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because Equinox Fund Management, LLC does not serve as a custodian for client funds or securities, and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

## Business Continuity Plan

### General

Equinox Fund Management, LLC has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key people.

### Disasters

The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived off site.

### Alternate Offices

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

## Information Security Program

### Information Security

Equinox Fund Management, LLC maintains an information security program to reduce the risk that your personal and confidential information may be breached.

### Privacy Notice

Equinox Fund Management, LLC is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of non public information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

With your permission, we disclose limited information to attorneys, accountants, and mortgage lenders with whom you have established a relationship. You may opt out from our sharing information with these nonaffiliated third parties by notifying us at any time by telephone, mail, fax, email, or in person. With your permission, we share a limited amount of information about you with your brokerage firm in order to execute securities transactions on your behalf.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier, secure data encryption techniques and authentication procedures in our computer environment.

We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our company records and your personal records as permitted by law.

Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.



We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

## Brochure Supplement (Part 2B of Form ADV)

### Equinox Fund Management, LLC Brochure Supplement (Part 2B of Form ADV)

#### Education and Business Standards

Equinox requires that those involved in determining or giving investment advice to clients be employees who are knowledgeable and experienced in the use of Equinox's proprietary portfolio analysis and properly registered as such. Furthermore, the Firm requires persons associated with it to comply with its Code of Ethics, a copy of which is available from the Firm upon request.

#### RICHARD E. BORNHOFT

##### *Registrations/Birth Date*

Mr. Bornhoft currently holds a CFTC/ NFA Series 3 registration. He was born in 1956.

##### *Business Experience*

President and Chief Investment Officer of The Bornhoft Group Corporation, or The Bornhoft Group, and has been registered as a principal and an associated person of The Bornhoft Group since September 1985 and November 1985, respectively. Mr. Bornhoft is also the Chairman of the Executive Committee, Chief Investment Officer and Manager of the Managing Owner of Equinox. In addition, Mr. Bornhoft has been registered as a principal and an associated person of the Managing Owner since August 2003. Mr. Bornhoft has over twenty-five years of experience in advising both Private and Institutional clientele in the alternative investment industry, beginning his career in 1979. The Bornhoft Group was formed in 1985 as an investment management firm, providing alternative investments (i.e., investments other than long-only investments in publicly-traded stocks, bonds and cash-equivalent securities) to

institutions and high net worth investors.

Over the past two decades, Mr. Bornhoft has been responsible for the planning, creation and execution of the company's business strategy. This responsibility has included such tasks as the design and implementation of the asset allocation, valuation and risk management systems, and the distribution of client assets into alternative investment products and services. His company has designed and operated alternative investment portfolios for approximately twenty (20) major pension plans, corporations and banking institutions throughout the world.

Prior to forming The Bornhoft Group in 1985, Mr. Bornhoft was Vice-President of Product Development for the Managed Account Corporation, an investment-consulting firm that offered managed futures products to its clientele. From 1979 to 1983, his activities included serving as a Denver branch manager for Geldermann, Inc. (a Chicago-based futures firm) and as an investment advisor, developing trading systems and advising client assets in managed futures. He has served on numerous arbitration boards and various committees of certain regulatory and industry organizations and is a frequent speaker at international conferences and symposiums on alternative investments.

He has written numerous articles in leading financial publications and is a contributing author to *The Handbook of Managed Futures—Performance, Evaluation and Analysis* (McGraw-Hill, 1997) and *Searching for Alpha—The Quest for Exceptional Investment Performance* (Wiley, 2000). Mr. Bornhoft was a founding principal of Morningstar Hedge Inc

##### *Disciplinary Actions*

Mr. Bornhoft has not been the subject of any legal or disciplinary events that would be material to a client's evaluation of him.

##### *Other Business Activities (Not Previously Disclosed Above)*

Mr. Bornhoft is not actively engaged in any investment-related business or occupation other than those already disclosed from which a material conflict might arise.

***Additional Compensation***

Mr. Bornhoft does not receive any economic benefit for providing advisory services from anyone who is not a client.

***Supervision***

Richard E. Bornhoft is supervised by Jason Gerb, Chief Compliance Officer (“CCO”). He reviews Mr. Bornhoft’s work through office interactions as well as remote interactions through phone and e-mail communications if Mr. Bornhoft is traveling. He also reviews Richard E. Bornhoft’s activities by monitoring his monthly, quarterly and annual disclosures and trade pre-clearances.

<b>Jason Gerb, CCO</b>	<b>Contact Information:</b>
<b>Telephone:</b>	<b>(609) 430-0404 ext. 125</b>
<b>Email:</b>	<b>jgerb@equinoxllc.com</b>

**AJAY DRAVID*****Registrations and Education***

He received a BSc in Physics from the University of Poona (India), an MA in Physics from SUNY at Stony Brook, an MBA in Finance and Marketing from the University of Rochester, and a PhD in Business from Stanford University in addition to a CFTC/ NFA Series 3 registration.

***Business Experience***

Ajay Dravid is the Managing Director of Portfolio Management for Equinox. Prior joining the Advisor and its affiliate, Equinox Financial Solutions, he was a member of the Executive Committee of The Frontier Fund. Dr. Dravid has more than 30 years of experience in industry, academia, and financial services. Most recently, he was an Adjunct Professor of Finance at the Fox School of Business, Temple University, and also taught MBA and Executive MBA courses at Columbia University, NYU, and Villanova University.

From 2004 to 2006, Dr. Dravid was President of Saranac Capital Management, a separate entity spun out from Citigroup to manage more than \$3 billion in hedge fund assets. From 1996 to 2004, he was a Director and then a Managing Director at Salomon Brothers and Citigroup, where he helped to build and manage the hedge fund business and

platforms. He was a Portfolio Co-Manager for the Multi-Strategy Arbitrage funds with more than \$1 billion in assets, a quantitative analyst for the Equity Long-Short hedge funds, and the head of the Risk Committee. He was also involved in the structuring and marketing of funds and client service. From 1993 to 1996, Dr. Dravid was a Vice President in the Asset Allocation Research Group of Salomon Brothers.

Between 1988 and 1993, Dr. Dravid was an Assistant Professor of Finance at the Wharton School of the University of Pennsylvania. He taught courses in Options and Futures and published papers in leading academic journals including Journal of Finance, Journal of Financial Economics, and Journal of Derivatives. Prior to 1988, he worked as a Financial Analyst and Management Accountant for several large manufacturing corporations in India and Dubai.

***Disciplinary Actions***

Mr. Dravid has not been the subject of any legal or disciplinary events that would be material to a client’s evaluation of him.

***Other Business Activities (Not Previously Disclosed Above)***

Mr. Dravid is not actively engaged in any investment-related business or occupation other than those already disclosed from which a material conflict might arise.

***Additional Compensation***

Mr. Dravid does not receive any economic benefit for providing advisory services from anyone who is not a client.

***Supervision***

Ajay Dravid is supervised by Jason Gerb, Chief Compliance Officer (“CCO”). He reviews Dr. Dravid’s work through office interactions as well as remote interactions through phone and e-mail communications if Dr. Dravid is traveling. He also reviews Ajay Dravid’s activities by monitoring his monthly, quarterly and annual disclosures and trade pre-clearances.

<b>Jason Gerb, CCO</b>	<b>Contact Information:</b>
<b>Telephone:</b>	<b>(609) 430-0404 ext. 125</b>
<b>Email:</b>	<b>jgerb@equinoxllc.com</b>



**RUFUS RANKIN*****Registrations and Education***

Mr. Rankin holds a Masters in International Studies from North Carolina State University and is currently ABD in the process of pursuing a Doctorate of Business Administration (Dissertation research: New Product Development in Alternative Investments) from Grenoble Ecole de Management in Grenoble, France.

***Business Experience***

Rufus Rankin is the Director of Portfolio Management for the Advisor and joined the Advisor in December, 2010. From February 2009 to present, Mr. Rankin also serves as Product Manager at Equinox Financial Solutions. In addition to his portfolio management responsibilities, Mr. Rankin works on the conception, development and implementation of new products and distribution strategies for investment products managed by Equinox Fund Management. Prior to his current role he performed sales for TFF, held roles at SEI and Morgan Stanley, and previously owned and operated a translation firm.

***Disciplinary Actions***

Mr. Rankin has not been the subject of any legal or disciplinary events that would be material to a client's evaluation of him.

***Other Business Activities (Not Previously Disclosed Above)***

Mr. Rankin is not actively engaged in any investment-related business or occupation other than those already disclosed from which a material conflict might arise.

***Additional Compensation***

Mr. Rankin does not receive any economic benefit for providing advisory services from anyone who is not a client.

***Supervision***

Rufus Rankin is supervised by Jason Gerb, Chief Compliance Officer ("CCO"). He reviews Mr. Rankin's work through office interactions as well as remote interactions through phone and e-mail communications if Mr. Rankin is traveling. He also reviews Rufus Rankin's activities by monitoring his

monthly, quarterly and annual disclosures and trade pre-clearances.

**Jason Gerb, CCO****Contact Information:****Telephone:****(609) 430-0404 ext. 125****Email:****jgerb@equinoxllc.com****BRIAN R. BELL*****Registrations/Birth Date***

Mr. Bell currently holds a CFTC/ NFA Series 3 registration. He was born in 1960.

***Educational Background***

Mr. Bell earned both his Masters of Science in Electrical Engineering (1987) and his Bachelors of Science (1982) in Engineering Physics from the University of Colorado.

***Business Experience***

Mr. Bell is a Partner and Director of Research for The Bornhoft Group Corporation and is responsible for the research and selection of qualified CTAs for various institutional and retail portfolios. Mr. Bell has been involved in the futures industry since 1987. He joined The Bornhoft Group in April 2005 and has been registered as a principal of The Bornhoft Group since August 2005. From September 2005 to November 2010, Mr. Bell was a principal of CTS Capital Management, LLC (a CTA located in Denver, Colorado) where he managed trading and research, focusing on a multiple-strategy portfolio approach. Beginning in February 2000, Mr. Bell was President and owner of Custom Trading Solutions, Inc., which developed and marketed CTS Studies and BestCommodityCharts.com, technical indicators used with CQG, Inc. and TradeStation to customers across North and South America, Australia, Asia and Europe.

Mr. Bell also developed and instructed three-day seminars on designing and evaluating mechanical trading systems to major Wall Street clients, including Morgan Stanley, Credit Suisse First Boston, SAC Capital, Greenwich Capital and FX Concepts, Inc.. Mr. Bell was registered under the CE Act as a principal of Custom Trading Solutions, Inc. from July 2003 until December 2005, and as an associated person in such

capacity from April 2004 until December 2005. Custom Trading Solutions, Inc. was registered under the CE Act as a CTA from July 2003 until December 2005, and as an NFA member from April 2004 until December 2005.

Mr. Bell also provided consulting services to many private and professional traders on the design and evaluation of technical indicators and trading systems. Additionally, he designed proprietary trading system evaluation and optimization algorithms and supporting software. Prior to starting Custom Trading Solutions, Inc. in February 2000, Mr. Bell was a Senior Software Engineer at CQG, Inc. for fourteen years from May 1987 through February 2000. It was at CQG, Inc. that Mr. Bell conducted technical analysis and trading system research which resulted in many of the features in CQG for Windows. He has published articles in *Technical Analysis of Stocks & Commodities*, and *Working Money Magazine*.

### ***Disciplinary Actions***

Mr. Bell has not been the subject of any legal or disciplinary events that would be material to a client's evaluation of him.

### ***Other Business Activities (Not Previously Disclosed Above)***

Furthermore, Mr. Bell is not actively engaged in any investment-related business or occupation other than those already disclosed from which a material conflict might arise.

### ***Additional Compensation***

Mr. Bell does not receive any economic benefit for providing advisory services from anyone who is not a client.

### ***Supervision***

Mr. Bell is supervised by Jason Gerb, CCO. He reviews Mr. Bell's work through office interactions as well as remote interactions through phone and e-mail communications if Mr. Bell is traveling. He also reviews Mr. Bell's activities by reviewing his monthly, quarterly and annual disclosures and trade pre-clearances.

**Jason Gerb, CCO**

**Contact Information:**

**Telephone:**

**(609) 430-0404 ext. 125**

**Email:**

**jgerb@equinoxllc.com**

## **JASON GERB, CCO**

### ***Registrations and Certifications***

Mr. Gerb was employed as a Principal Examiner with FINRA from May, 2005 until July, 2011. Mr. Gerb holds the FINRA Certified Regulatory Compliance Professional (CRCP) Designation from the Wharton School, University of Pennsylvania, Certified Mutual Fund Specialist (CMFS) Designation from the Boston Institute of Finance; and is a member of the Association of Certified Fraud Examiners (ACFE) and the National Society of Compliance Professionals (NSCP). He also holds the Series 7, 24, and 66 licenses.

### ***Educational Background***

Mr. Gerb graduated from Montclair State University with a BA in Political Science and a minor in Pre-Law. He was born June 23, 1975.

### ***Business Experience***

Mr. Gerb has 15 years of broad-based industry experience with broker-dealers and investment advisors.

Prior to joining Equinox in 2011, Mr. Gerb spent six years with FINRA as a Principal Examiner, where he led teams conducting complex examinations of member firms' operations and sales practices for compliance with NASD, FINRA, MSRB, and SEC rules and regulatory guidelines. He was also a member of FINRA's national Regulatory Expert team concentrating on complex mutual fund and variable product sales practice issues. Mr. Gerb holds the Certified Regulatory and Compliance Professional ("CRCP") designation from FINRA Institute at the Wharton School University of Pennsylvania.

Mr. Gerb is the Chief Compliance Officer of Equinox Fund Management and its affiliated broker-dealer, Equinox Group Distributors, LLC. Mr. Gerb is responsible for all compliance and regulatory oversight at Equinox. His duties include implementing the necessary systems, policies, and procedures for compliance with all applicable securities laws and regulations.

### ***Disciplinary Actions***

Mr. Gerb has not been the subject of any legal or disciplinary events that would be material to a client's evaluation of him.

***Other Business Activities (Not Previously  
Disclosed Above)***

Furthermore, Mr. Gerb is not actively engaged in any investment-related business or occupation other than those already disclosed from which a material conflict might arise.

***Additional Compensation***

Mr. Gerb does not receive any economic benefit for providing advisory services from anyone who is not a client.

***Supervision***

Mr. Gerb is self-supervised.

**Jason Gerb, CCO****Contact Information:****Telephone:****(609) 430-0404 ext. 125****Email:****jgerb@equinoxllc.com**

# EQUINOX

Fund Management, LLC

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