



Red Dot Trading, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: March 19, 2011

Revised: June 20, 2011

This Disclosure Brochure provides information about the qualifications and business practices of Red Dot Trading, LLC ("Red Dot"). If you have any questions about the contents of this Disclosure Brochure, please contact us at (212) 503-0410.

Red Dot is a Registered Investment Advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Red Dot to assist you in determining whether to retain the Advisor.

Additional information about Red Dot and its advisory persons are available on the SEC's website at www.adviserinfo.sec.gov.

Red Dot Trading, LLC
CRD No: 156822
555 Fifth Avenue, 6th Floor
New York, NY 10017
Phone: (212) 503-0410

Item 2 - Material Changes

On July 28, 2010, the U.S. Securities and Exchange Commission voted unanimously to adopt amendments to Part 2 of Form ADV and related rules under the Investment Advisers Act of 1940 (the "Advisers Act"). The amendments are designed to require a registered investment adviser to provide Clients with a clearly written and meaningful disclosure, in plain English, about the advisor's business practices, conflicts of interest and advisory personnel. The new Form ADV 2 is divided into two parts: *Part 2A and Part 2B*.

Part 2A (the "Disclosure Brochure") provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. *Part 2B* (the "Brochure Supplement") provides information about advisory personnel of Red Dot.

Red Dot believes that communication and transparency are the foundation of our relationship and continually strive to provide you with the complete and accurate information at all times. We encourage all current and prospective investors to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Initial Filing

Red Dot is an established Registered Investment Advisor; however, this is the initial filing of the Disclosure Brochure pursuant to the new regulations.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Red Dot.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

To review the firm information for Red Dot:

- Click **Investment Advisor Search** in the left navigation menu.
- Select the option for **Investment Advisor Firm** and enter **156822** (our firm's CRD number) in the field labeled "Firm IARD/CRD Number".
- This will provide access to Form ADV Part 1 and Part 2.
- Item 11 of the ADV Part 1 lists legal and disciplinary questions regarding the Advisor.
- In the left navigation menu, Form ADV Part 2 is located near the bottom.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (212) 503-0410.

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Item 4 - Advisory Services

A. Firm Information

Red Dot Trading, LLC ("Red Dot" or the "Advisor") is a Registered Investment Advisor with the SEC, which is organized as a Limited Liability Company (LLC) under the laws of the State of Delaware. Red Dot is owned and operated by Eastbridge Real Estate LLC, a Delaware limited liability company ("Eastbridge"). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Red Dot.

B. Advisory Services Offered

Red Dot offers portfolio management to business or institutional clients (other than investment companies) and acts as an investment advisor to private funds, including collective investment schemes (each referred to as a "Client").

Account Portfolio Management

Red Dot provides continuous, active management of Client investment portfolios. Red Dot has developed a client service model that includes discovery, implementation and monitoring components.

- *Client Discovery* – Upon entering into an advisory agreement with Red Dot, Red Dot will begin a process of Client discovery. Red Dot seeks to uncover a Client's investment objectives, their tolerance and capacity for risk, as well as other issues. Red Dot will also collect information concerning the Client's financial status, and assets, among other things.
- *Portfolio Implementation* – Upon completion of this investment profile information Red Dot will implement an investment portfolio. Red Dot will invest Client assets in variety of instruments, depending on various factors based upon Red Dot's proprietary investment analysis. Investment securities may include any class/sector/instrument deemed appropriate by Red Dot.
- *Portfolio Monitoring and Maintenance* – Red Dot will continuously monitor investment portfolios to ensure that the portfolio meets the Client's objective of generating speculative gains. Further, Red Dot monitors each Client portfolio in order to ensure they are invested in accordance with Red Dot's firm-wide investment guidance and economic outlook.

It is the Client's responsibility to notify Red Dot promptly of any change to the information provided by the Client, including any change to any investment objectives, risk tolerance, investment time horizon, and any investment policies, guidelines or reasonable restrictions. Red Dot will honor Client restrictions unless those restrictions impair Red Dot's ability to manage Client assets.

Prior to rendering investment management services each Client must affirm their status as a Qualified Client, under Rule 205-3 of the Investment Advisers Act of 1940, as amended.

Red Dot will provide investment advisory services and portfolio management services and will not provide securities custodial or other administrative services. At no time will Red Dot accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client Investment Advisory Agreement.

C. Client Account Management

Prior to engaging Red Dot to provide investment advisory services, the Client is required to enter into an investment management agreement with Red Dot setting forth the terms and conditions of the engagement and the services to be provided.

Client account management is executed via separate accounts. Red Dot currently offers a single investment strategy/methodology. Portfolio construction may vary among Clients based upon tenure, available cash, withdrawals and additions, and Client investment restrictions. However, all portfolios are managed in accordance with a single, proprietary strategy and methodology. (Item 8 below provides more information about our investment strategies.)

Red Dot does not provide financial planning services. While Red Dot reviews Client characteristics, the suitability of investing with Red Dot, in the context of the Client's larger financial picture, lies solely with the Client.

All portfolios are rebalanced as necessary upon Red Dot review. More or less frequent rebalancing may be required depending on macroeconomic, market or sector factors.

The Red Dot portfolio strategy may include investments in common stocks, preferred stocks, investment grade and non-investment grade corporate bonds (including private placements), U.S. Government and agency securities, convertible securities (including stocks and convertible corporate bonds), derivative instruments (options and futures), open and closed-end investment companies, publicly traded real estate investment trusts, and any marketable security deemed appropriate by Red Dot portfolio managers.

D. Wrap Fee Programs

Red Dot does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Red Dot.

E. Assets Under Management

Red Dot is a newly established advisor. Assets under management shall be reported following the Advisor's December 31, 2011 fiscal year end. Clients may request more current information at any time by contacting the Advisor.

Item 5 - Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for investment management services. Each Client shall sign an Investment Advisory Agreement that details the responsibilities of Red Dot and the Client.

A. Fees for Advisory Services

Monthly Management Fee – Clients will pay a Monthly Management Fee. This Monthly Management Fee is payable to Red Dot generally at a rate of 2.00% annualized. Each month Red Dot will execute an in-depth portfolio review to ensure that each portfolio is managed in accordance with Red Dot mandates and Client constraints. The terms of the Monthly Management Fee may be modified based on written agreement with the Client.

Performance Fee – In addition to the Management Fee, Red Dot will charge Clients a Performance Fee. The standard Performance Fee is generally 20% for trading profits above the closing account balance of the prior fiscal period. The Performance Fee will be calculated and charged in arrears at the end of each fiscal period. The fiscal period will be the calendar year ending December 31. The Performance Fee is subject to a High Water Mark (see below). A detailed written detailed calculation of the Performance Fee will be provided to the Client after the end of each calendar year when applicable. The Performance Fee structure may be negotiated only under special circumstances. The terms of the Performance Fee may be modified based on written agreement with the Client.

High Water Mark – Red Dot’s Performance Fee is subject to a loss carry forward limitation (a “High Water Mark”) such that no Performance Fee will be paid by a Client until prior net losses, if any, have been recouped. A loss carry forward of a Client will be proportionately reduced to take into account any withdrawals by that Client.

All securities held in a portfolio managed by Red Dot will be independently valued by the Custodian. Red Dot will not have the authority or responsibility to value portfolio securities.

Retainer Fee – In specific cases, Red Dot may charge a fee for consulting services based on services selected by the client, these fees will be determined based on the complexity and duration of the engagement. Typically, fees are a fixed dollar amount. This fee includes the services and costs for contracted services. Retainer fees will be determined in advance of an engagement and agreed to in writing by the Client and Red Dot. Extraordinary costs and expenses may be billed separately, and in addition to, the contracted retainer fee.

B. Fee Billing

Monthly Management Fee – The Monthly Management Fee will be billed by way of an invoice mailed to the Client, or as determined in writing by the Client. Immediately following the monthly review, Red Dot will send to the account Custodian an invoice and the Client an invoice showing the amount to be withdrawn and how that figure was calculated. The Custodian will debit the Client’s account and allocate those funds to Red Dot. The terms of such billing may be modified based on written agreement with the Client, and may also be subject to a related advisory agreement, trust agreement, or based on any other agreed to structure with the Client.

Performance Fee – The Performance Fee will be determined once annually following the fiscal period. Red Dot will send to the account Custodian an invoice and the Client an invoice showing the amount to be withdrawn and how that figure was calculated. The Custodian will debit the Client’s account and allocate those funds to Red Dot. The terms of such billing may be modified based on written agreement with the Client, and may also be subject to a related advisory agreement, trust agreement, or based on any other agreed to structure with the Client.

Retainer Fee – In the specific situation where a Retainer Fee for a Client is agreed, Red Dot may bill up to 50% of the fee in advance of commencing any project work. The balance of the fee is due upon completion of the work agreed to by contract. Retainer fees will not be debited from the Client’s account. Red Dot will bill Clients directly. Red Dot will mail to the Client an invoice for the retainer fee. In such cases, no invoice will be sent the custodian of the Client. Payment is due within 10 business days of receiving the invoice.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third-parties, other than Red Dot, in connection with investment made on behalf of the Client’s account(s). The Investment Advisory Fee charged by Red Dot is separate and distinct from these custodian and execution fees, unless otherwise agreed to and based upon a related advisory agreement, trust agreement, or based on any other agreed to structure with the Client.

In addition, all fees paid to Red Dot for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund’s prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Red Dot, but would not receive the services provided by Red Dot which are designed, among other things, to assist the Client in determining which products or services are most appropriate to each Client’s financial condition and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Red Dot to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Advance Fees – As noted above in certain situations, Red Dot may be compensated for consulting services by way of a Retainer Fee paid in advance if the engagement. Clients may request to terminate their consulting agreement with Red Dot at any time, in whole or in part, by providing advance written or oral notification. No portion of the paid Retainer Fee shall be refundable. Upon termination, Red Dot will cease all work. The Client shall not be responsible for any due balance at termination. The Client's consulting agreement with Red Dot is non-transferable without Client's written approval.

Termination – Clients may request to terminate their Investment Advisory Agreement with Red Dot pursuant to the terms of the specific Investment Management Agreement, in whole or in part, in accordance with the terms of the Client Agreement. The Client shall be responsible for fees up to and including the effective date of termination before client funds are removed from the Custodian's account. Red Dot will refund any unearned, prepaid fees, if any.

Clients may terminate the Investment Management Agreement without penalty (full refund or no fees due) within 5 business days of signing the Agreement if the Red Dot Form ADV Part 2 was not delivered at least 48 hours prior to client's execution of the Agreement.

The Client's Investment Management Agreement with Red Dot is non-transferable without Client's written approval.

Upon termination, no portion of the Incentive Allocation shall be payable back to the Client as this fee is paid in arrears.

E. Compensation for Sales of Securities

Red Dot does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the Investment Advisory Fees noted above.

Item 6 - Performance-Based Fees

Performance-based Fees – Red Dot will charge a Performance Fee for all accounts owned by Qualified Investors. The Performance Fee paid by certain eligible Clients to Red Dot may create an incentive for the Red Dot to make investments that are riskier or more speculative than would be the case if this fee were not paid. Since the Performance Fee is calculated on a basis which includes unrealized appreciation of the Client's account, such fee may be greater than if it were based solely on realized gains.

Side-by-side Management – Red Dot does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options for its Clients.

Item 7 - Types of Clients

Red Dot may provide services to a variety of client types. Clients may include:

- Businesses, Institutional Clients (other than Investment Companies) and Private Funds – Includes collective investment schemes.

The relative percentage each client type currently represents is available on Red Dot's Form ADV Part 1. The actual mix of types of Clients changes over time based upon market conditions, business plans and other factors.

Red Dot does not specialize in, or actively seek, any given client type. Red Dot is committed to providing services to qualified investors, regardless of legal or corporate status.

Red Dot provides customized services to meet the unique needs of each Client. Additional details are contained in Item 4 – Advisory Services.

Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

Proprietary Software – Red Dot currently holds a license to investment software used in Red Dot’s proprietary securities research and selection strategy/methodology. Red Dot will use this software in their analysis of securities for Client portfolios. The software uses various quantitative measures of securities and determines the investment’s suitability based on certain pre-determined criteria.

Fundamental Analysis – Generally, Red Dot uses Fundamental Analysis in making investment decisions with respect to investments in equities, options and fixed-income instruments. Fundamental Analysis is the process of looking at economic and business indicators as investment selection criteria. These criteria are usually ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Red Dot considers macroeconomic factors as well as issue specific factors.

Macroeconomic factors considered by Red Dot include, but are not limited to; general economic conditions, inflation trends, interest rates and the yield curve, market volatility and trends, and the monetary policies and legislative actions of certain countries.

Issue specific factors include, but are not limited to; specific industry expertise, earnings, cash flow, growth estimates and trends, management strength and stability and the issuer’s credit rating.

Other methods of analysis may be employed by Red Dot as deemed appropriate.

Change in Valuations – Securities are deemed suitable for purchase or sale when they meet certain criteria to indicate that there exist an estimated increased probability for an outsized move as a function of a change in the valuation multiple, among other factors. This change may be an increase or decrease in price and thus Red Dot may either purchase or sell the security and/or derivatives of the security.

Technical Analysis and Charting – Technical Analysis and Charting are used for analyzing various economic and market trends. These trends, both short- and long-term, are used for determining specific trade entry and exit points and broad economic analysis. These trends may include put/call ratios, pricing trends, moving averages, volume, and changes in volume, among many others. Indicators used by Red Dot do not speak to the financial health of a particular issuer. Rather, indicators are used to gauge market sentiment regarding a given issue. Technical Analysis and Charting will be used primarily for the timing of a particular trade, and not security selection.

B. Investment Strategies

Red Dot structures portfolios using the various methodologies described above. The first step in the securities selection process is to screen the universe of investment options with the proprietary software Red Dot licenses. This step is an automated, quantitative process to narrow the investment possibilities. Once securities have been included as a possible investment option, Red Dot then screens further using a human-based, qualitative screen

for investment securities. The qualitative screens are described above and will include fundamental, industry-related technical and cyclical analysis of investment securities. Using this proprietary methodology, Red Dot believes that Clients will benefit from having a portfolio of holdings invested in a variety of uncorrelated assets. To the extent that these assets are non-correlated, the portfolio will experience investment returns with mitigated risk.

Red Dot's strategy is to generate short- and intermediate-term trading profits and is speculative in nature.

C. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Red Dot will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Red Dot may use margin in Client accounts for to manage the timing of purchases and sales, as appropriate. Red Dot may employ options strategies to hedge or gain additional exposure to a particular asset class or sector. Red Dot's investment strategy is encompasses active trading in concentrated portfolios. Following are some of the risks associated with Options, Margin and Short-Sale transactions:

Leverage – Borrowing on margin is the practice of borrowing securities or cash to pay for securities, referred to as "leverage". Leverage allows an investment manager to control more securities than they may otherwise without cash on hand. Leverage may compound both gains and losses. Further, investment gains must be greater than the cost of borrowing for such investments to be profitable.

Options and Futures – Certain investment strategies offered by Red Dot may make use of options and/or futures contracts. These option and futures contracts run the risk of losing value in a relatively short period of time. Option and futures contracts are leveraged, derivative instruments that allow the holder of a single contract to control many shares of the underlying issue. This imbedded leverage may compound gains and losses.

Other Risks - Please remember that different types of investments involve varying degrees of risk, including the possible loss of principal or perhaps losses greater than principle invested and that past performance may not be indicative of future results. Therefore, it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies undertaken by Red Dot) will be profitable.

Certain investments by Red Dot may involve the use of long or short positions that are leveraged, or option positions that are uncovered by the underlying issue. It is possible for an investor to lose more than their

invested capital. Red Dot has implemented prudent risk management measures; however, no guarantees can be made that these measures will prevent significant loss of capital.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact us at (212) 503-0410.

Item 9 - Disciplinary Information

Red Dot and its advisory personnel value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider in which you partner. Background information is available on the Investment Advisor Public Disclosure website at <http://advisorinfo.sec.gov>.

To review the firm information for Red Dot, click **Investment Advisor Search** in the left navigation menu and enter, select the option for Investment Advisor Firm and enter **156822** (*our firm's CRD number*) in the field labeled "Firm IARD/CRD Number:". This will provide access to Form ADV Parts 1 and 2. Item 11 of the ADV Part 1 lists legal and disciplinary questions.

There are no legal, regulatory or disciplinary events involving Red Dot or any of its employees.

Item 10 - Other Financial Activities and Affiliations

Investment Advisor/Manager Affiliations – Red Dot is not currently affiliated with any other investment advisor or investment manager. Red Dot is wholly owned and operated by Eastbridge Real Estate LLC, which may be involved in unrelated private transactions from time to time. Red Dot functions solely as the Investment Manager in respect of securities trading activities.

Red Dot has implemented a Code of Ethics and signed non-disclosure agreements to prevent and detect unauthorized conduct.

Item 11 - Code of Ethics, Participation in Client Transactions and Personal Trading

A. Code of Ethics

Red Dot has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Red Dot. The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Red Dot and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Red Dot associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include; general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. Red Dot has written its Code of Ethics to meet and exceed regulatory standards. To request a copy of our Code of Ethics, please contact us at (212) 503-0410.

B. Personal Trading and Conflicts of Interest

Red Dot allows its employees to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a potential

conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you.

At no time, will Red Dot or any associated person of Red Dot, transact in any security to the detriment of any Client.

Item 12 - Brokerage Practices

A. Recommendation of Custodian(s)

Red Dot may have discretionary authority to select the broker-dealer/custodian (herein the "Custodian") for custodial and execution services, and may have discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Red Dot may also receive research services (but not compensation) as a result of recommending a particular broker.

Red Dot considers a number of factors in selecting and/or recommending brokers and custodians for its Clients' accounts, including, but not limited to, execution capability, experience and financial stability, reputation and the quality of services provided.

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services.

Red Dot does not participate in soft dollar programs sponsored or offered by any broker-dealer.

2. Brokerage Referrals - Red Dot does not receive any compensation from brokerage firms or any other entity in connection with the recommendation for establishing a brokerage account.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Red Dot may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

Item 13 - Review of Accounts

A. Frequency of Reviews

Accounts are monitored on an ongoing basis by Red Dot for adherence to investment strategy and Client Objective. Investment management and supervision over the securities contained in the Client's portfolio are performed in an ongoing basis by Red Dot, as applicable.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Red Dot if changes occur in his/her personal financial situation that might adversely affect his/her investment plan.

Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Trustee or Custodian, or as otherwise determined by the Client in the Investment Management Agreement. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s].

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Red Dot

Red Dot is a Fee-Only advisor, who, in all circumstances, is compensated solely by the Client. Red Dot does not receive commissions or other compensation from product sponsors, broker dealers or any un-related third party. Red Dot may refer Clients to various third-parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Red Dot may receive referrals of new Clients from a third-party.

B. Client Referrals from Solicitors

If a Client is introduced to Red Dot by either an unaffiliated party or by a Red Dot affiliate, Red Dot may pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, as amended, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from the investment management fees earned by Red Dot, and shall not result in any additional charge to the Client. If the Client is introduced to Red Dot by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of his/her/its solicitor relationship. If Red Dot subsequently contacts or is contacted by the prospective Client, Red Dot shall provide each prospective Client with a copy of Red Dot's Form ADV 2 (the written disclosure statement also known as the "Brochure") and a copy of the solicitor's written disclosure document and a statement to the Client disclosing the terms of the solicitation arrangement between Red Dot and the solicitor, including the compensation to be received by the solicitor from Red Dot.

Item 15 - Custody

Red Dot may have discretion with respect to Custodians as determined by the Client in the Investment Management Agreement. Payments of fees may be paid by the custodian from the custodial brokerage account that holds the Client's assets. For more information custodians and brokerage practices, see Item 12 - Brokerage Practices.

Item 16 - Investment Discretion

Red Dot generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to

specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Red Dot. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Red Dot will be in accordance with each Client's investment objectives and goals.

Item 17 - Voting Client Securities

Red Dot does not accept proxy-voting responsibility for any Client.

Item 18 - Financial Information

Neither Red Dot, nor its management has any adverse financial situations that would reasonably impair the ability of Red Dot to meet all obligations to its Clients. Neither Red Dot, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Red Dot is not required to deliver a balance sheet along with this Brochure as the firm does not collect advance fees for services to be performed six months or more in advance.

Item 19 - Other Requirements for Registered Advisors

A. Educational Background and Business Experience of the Principal Officers

See ADV Part 2B for information on the Principal Officers of Red Dot Trading LLC.

B. Other Business Activities of the Principal Officers

See ADV Part 2B for information on the Principal Officers of Red Dot Trading LLC.

C. Performance Fee Calculations

See ADV Part 2B for information on the Principal Officers of Red Dot Trading LLC.

D. Disciplinary Information

See ADV Part 2B for information on the Principal Officers of Red Dot Trading LLC.

E. Material Relationships with Issuers of Securities

See ADV Part 2B for information on the Principal Officers of Red Dot Trading LLC.



Red Dot Trading, LLC

**Rick H. Singer
Edward E. Hamilton
Michael J. Fowler
Steven L. Richman
Stephanie M. Miller**

Form ADV Part 2B – Brochure Supplement

Effective: March 19, 2011

Revised: June 20, 2011

This Brochure Supplement provides information about the background and qualifications of Rick H. Singer (CRD #1144531), Edward E. Hamilton (CRD #1607897), Michael J. Fowler (CRD #4513451), Steven L. Richman (CRD #5944237) and Stephanie M. Miller (CRD #5944224) (collectively referred to as the “Principal Officers of Red Dot”) in addition to the information contained in the Red Dot Trading, LLC (“Red Dot” or the “Advisor” - CRD #156822) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you any questions about the contents of the Red Dot Disclosure Brochure or this Brochure Supplement, please contact us at (212) 503-0410.

Additional information about the Principal Officers is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov.

Item 2 – Educational Background and Business Experience

A. Rick H. Singer

Rick H. Singer is the Chief Executive Officer of Red Dot and was born in 1954.

Mr. Singer earned his *Juris Doctor*, with distinction, from Hofstra University and a Bachelor of Arts from Stony Brook University.

Additional information regarding Mr. Singer's employment history is included below.

Employment History:

CEO, Red Dot Trading LLC	Present
Founding Member and CEO, Eastbridge Real Estate LLC	2009 to Present
Executive Managing Director, Island Capital Group LLC	2006 to 2008
Senior Partner, Eastbridge Ventures LLC	2002 to 2006
Principal Investor and General Partner, Asset Recovery Fund	1998 to 2002
Head of Global Real Estate, Salomon Brothers Inc.	1989 to 1998
Member, Eastdil Realty, Inc.	1982 to 1989
Attorney, Schulte Roth and Zabel	1979 to 1982

B. Edward E. Hamilton

Edward E. Hamilton is the Head of Business Development for Red Dot and was born in 1961.

Mr. Hamilton earned his Bachelor of Science in Business Administration from Pace University.

Additional information regarding Mr. Hamilton's employment history is included below:

Employment History:

Head of Business Development, Red Dot Trading, LLC	Present
Head of Business Development, Eastbridge Real Estate LLC	2009 to Present
Founding Partner, SAM Group	2006 to 2008
Senior Managing Director, Broadstreet Group	2003 to 2006
Principal Member, Axel Ventures Inc.	2000 to 2003
Managing Director, Kidder Peabody and Paine Webber	1987 to 1999

C. Michael J. Fowler

Michael Fowler is the Senior Portfolio Manager of Red Dot and was born in 1985.

Mr. Fowler participated in an educational program developed to comply with local high school requirements of Bound Brook High School, New Jersey. Thereafter, Mr. Fowler chose not to attend college, but instead devoted his professional life to securities trading and finance.

Additional information regarding Michael Fowler's employment history is included below.

Employment History:

Senior Portfolio Manager, Red Dot Trading, LLC	Present
Senior Portfolio Manager and Head of Risk, Eastbridge Real Estate LLC	2009 to Present
Trader, The Geneva Group	2006 to 2007

Trader, FSF Capital Partners	2006
Trader, Axxess Capital, LLC	2002 to 2006
Equity Derivative Trader, ETG Trading	2002

D. Steven L. Richman

Steven L. Richman is the Chief Compliance Officer of Red Dot and was born in 1948.

Mr. Richman earned his Bachelor of Science from the City College of New York.

Employment History:

Chief Compliance Officer, Red Dot Trading, LLC	Present
Chief Financial Officer, Eastbridge Real Estate	2009 to Present
Managing Director, Northfield Advisors LLC	2008 to 2011
Managing Director and Principal, The Whitehill Group, Inc.	1996 to 2008
Executive Vice President and CFO, The Raynes Companies	1984 to 1996
Senior Manager, Price Waterhouse Coopers	1979 to 1984

E. Stephanie M. Miller

Stephanie M. Miller is the Head of Operations for Red Dot and was born in 1984.

Ms. Miller earned her Bachelor of Science, with honors, from Vanderbilt University.

Employment History:

Head of Operations, Red Dot Trading, LLC	Present
Chief Operations Officer, Eastbridge Real Estate	2009 to Present
Assistant to General Counsel, Island Capital Group	2007 to 2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding the Principal Officers of Red Dot. No Principal Officer of Red Dot has ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against any of the Principal Officers of Red Dot.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. *As previously noted, there are no legal, civil or disciplinary events to disclose regarding any of the Principal Officers of Red Dot.*

However, we do encourage you to independently view the background of any of the Principal Officers of Red Dot on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter the individual's CRD number in the field labeled "Individual CRD Number".

Item 4 – Other Business Activities

Red Dot is not currently affiliated with any other investment advisor or investment manager. Red Dot is wholly owned and operated by Eastbridge Real Estate LLC, which may be involved in unrelated private transactions from time to time. Red Dot functions solely as the Investment Manager in respect of securities trading activities.

Item 5 – Additional Compensation

The Principal Officers of Red Dot are dedicated to the investment advisory activities of Red Dot's Clients. The Principal Officers of Red Dot do not receive any additional forms of compensation for rendering investment advice via Red Dot.

Item 6 – Supervision

Rick Singer serves as Chief Executive Officer of Red Dot and is supervised by Steven Richman, the Chief Compliance Officer. Mr. Richman can be reached at (212) 856-9200.

Edward Hamilton serves as the Head of Business Development for Red Dot and is supervised by Rick Singer, the Chief Executive Officer along with Steven Richman, the Chief Compliance Officer. Mr. Singer can be reached at (212) 503-0410. Mr. Richman can be reached at (212) 856-9200.

Michael Fowler serves as the Senior Portfolio Manager of Red Dot and is supervised by Rick Singer, the Chief Executive Officer along with Steven Richman, the Chief Compliance Officer. Mr. Singer can be reached at (212) 503-0410. Mr. Richman can be reached at (212) 856-9200.

Steven Richman serves as the Chief Compliance Officer of Red Dot and is supervised by Rick Singer, the Chief Executive Officer. Mr. Singer can be reached at (212) 503-0410.

Stephanie Miller serves as the Head of Operations for Red Dot and is supervised by Rick Singer, the Chief Executive Officer along with Steven Richman, the Chief Compliance Officer. Mr. Singer can be reached at (212) 503-0410. Mr. Richman can be reached at (212) 856-9200.

Red Dot has implemented a Code of Ethics and internal compliance that guide each employee in meeting their fiduciary obligations to Clients of Red Dot. Further, Red Dot is subject to regulatory oversight by various agencies. These agencies require registration by Red Dot and its employees. As a registered entity, Red Dot is subject to examinations by regulators, which may announced or unannounced. Red Dot is required to periodically update the information provided to these agencies and to provide various reports regarding firm business and assets.

Privacy Policy

Effective: June 20, 2011

Our Commitment to You

Red Dot Trading, LLC ("Red Dot") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Red Dot (referred to as "we", "our" and "us" throughout this notice) protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Red Dot provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this privacy policy.

The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address	• Income
• Phone number	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

Information About You That Red Dot Shares

Red Dot works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Red Dot's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of

your personal information to the performance of the specific service we have requested.

To repeat, we do not sell your non-public personal information to anyone.

Information About Former Clients

Red Dot does not disclose, and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our clients.

Confidentiality and Security

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

We'll Keep You Informed

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy policy, and will provide you with a revised policy if the changes materially alter the previous privacy policy. We will not, however, revise our privacy policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. You may obtain a copy of our current privacy policy by contacting us at (212) 503-0410.