A Commodity Trading Advisor Registered with the US Commodity Futures Trading Commission

Executive Office:
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Germantown, TN, 38138
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Disclosure Document

Dated: February 23, 2011

Diversified Futures Trading Program

THE COMMODITY FUTURES TRADING COMMISSION HAS NOT PASSED UPON THE MERITS OF PARTICIPATING IN THIS TRADING PROGRAM NOR HAS THE COMMISSION PASSED ON THE ADEQUACY OR ACCURACY OF THIS DISCLOSURE DOCUMENT

The delivery of this Disclosure Document at any time does not imply that the information contained herein is correct as of any time subsequent to the date shown above.

RISK DISCLOSURE STATEMENT

THE RISK OF LOSS IN TRADING COMMODITY INTERESTS CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. IN CONSIDERING WHETHER TO TRADE OR TO AUTHORIZE SOMEONE ELSE TO TRADE FOR YOU, YOU SHOULD BE AWARE OF THE FOLLOWING:

IF YOU PURCHASE A COMMODITY OPTION YOU MAY SUSTAIN A TOTAL LOSS OF THE PREMIUM AND OF ALL TRANSACTION COSTS.

IF YOU PURCHASE OR SELL A COMMODITY FUTURES CONTRACT OR SELL A COMMODITY OPTION OR ENGAGE IN OFF-EXCHANGE FOREIGN CURRENCY TRADING YOU MAY SUSTAIN A TOTAL LOSS OF THE INITIAL MARGIN FUNDS OR SECURITY DEPOSIT AND ANY ADDITIONAL FUNDS THAT YOU DEPOSIT WITH YOUR BROKER TO ESTABLISH OR MAINTAIN YOUR POSITION. IF THE MARKET MOVES AGAINST YOUR POSITION, YOU MAY BE CALLED UPON BY YOUR BROKER TO DEPOSIT A SUBSTANTIAL AMOUNT OF ADDITIONAL MARGIN FUNDS, ON SHORT NOTICE, IN ORDER TO MAINTAIN YOUR POSITION. IF YOU DO NOT PROVIDE THE REQUESTED FUNDS WITHIN THE PRESCRIBED TIME, YOUR POSITION MAY BE LIQUIDATED AT A LOSS, AND YOU WILL BE LIABLE FOR ANY RESULTING DEFICIT IN YOUR ACCOUNT.

UNDER CERTAIN MARKET CONDITIONS, YOU MAY FIND IT DIFFICULT OR IMPOSSIBLE TO LIQUIDATE A POSITION. THIS CAN OCCUR, FOR EXAMPLE, WHEN THE MARKET MAKES A ''LIMIT MOVE.'' THE PLACEMENT OF CONTINGENT ORDERS BY YOU OR YOUR TRADING ADVISOR, SUCH AS A ''STOP-LOSS'' OR ''STOP-LIMIT'' ORDER, WILL NOT NECESSARILY LIMIT YOUR LOSSES TO THE INTENDED AMOUNTS, SINCE MARKET CONDITIONS MAY MAKE IT IMPOSSIBLE TO EXECUTE SUCH ORDERS.

A ''SPREAD'' POSITION MAY NOT BE LESS RISKY THAN A SIMPLE ''LONG'' OR ''SHORT'' POSITION.

THE HIGH DEGREE OF LEVERAGE THAT IS OFTEN OBTAINABLE IN COMMODITY INTEREST TRADING CAN WORK AGAINST YOU AS WELL AS FOR YOU. THE USE OF LEVERAGE CAN LEAD TO LARGE LOSSES AS WELL AS GAINS.

IN SOME CASES, MANAGED COMMODITY ACCOUNTS ARE SUBJECT TO SUBSTANTIAL CHARGES FOR MANAGEMENT AND ADVISORY FEES. IT MAY BE NECESSARY FOR THOSE ACCOUNTS THAT ARE SUBJECT TO THESE CHARGES TO MAKE SUBSTANTIAL TRADING PROFITS TO AVOID DEPLETION OR EXHAUSTION OF THEIR ASSETS. THIS DISCLOSURE DOCUMENT CONTAINS, AT PAGE 13, A COMPLETE DESCRIPTION OF EACH FEE TO BE CHARGED TO YOUR ACCOUNT BY THE COMMODITY TRADING ADVISOR.

THIS BRIEF STATEMENT CANNOT DISCLOSE ALL THE RISKS AND OTHER SIGNIFICANT ASPECTS OF THE COMMODITY INTEREST MARKETS. YOU SHOULD THEREFORE CAREFULLY STUDY THIS DISCLOSURE DOCUMENT AND COMMODITY INTEREST TRADING BEFORE YOU TRADE, INCLUDING THE DESCRIPTION OF THE PRINCIPAL RISK FACTORS OF THIS INVESTMENT, AT PAGE 8.

THIS COMMODITY TRADING ADVISOR IS PROHIBITED BY LAW FROM ACCEPTING FUNDS IN THE TRADING ADVISOR'S NAME FROM A CLIENT FOR TRADING COMMODITY INTERESTS. YOU MUST PLACE ALL FUNDS FOR TRADING IN THIS TRADING PROGRAM DIRECTLY WITH A FUTURES COMMISSION MERCHANT OR RETAIL FOREIGN EXCHANGE DEALER, AS APPLICABLE.

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BACKGROUND OF THE ADVISOR AND ITS PRINCIPALS

No person is authorized by Opus Futures, LLC or its affiliates to give any information or make any representation not contained in this Disclosure Document.

Opus Futures, LLC (the "Advisor") is a Tennessee limited liability company that was organized in December 2010. The Advisor is registered with the Commodity Futures Trading Commission ("CFTC") as a Commodity Trading Advisor ("CTA") and is a member of the National Futures Association ("NFA") in such capacity. The registration of the Advisor as a CTA and NFA Member became effective on January 20, 2011. The business office of the Advisor is 9047 Poplar Avenue, Suite 101, Germantown, Tennessee, 38138 and the telephone number is (901) 766-4446. The Advisor does not intend to use this document prior to the date of the document.

Biographical information on the principals of the Advisor (hereinafter the "Principals") is listed below:

David Zelinski ("Mr. Zelinski") is Chairman of the Advisor and is primarily responsible for the trading decisions of the Advisor. Mr. Zelinski is an individual registered the CFTC as an Associated Person of Nesvick Trading Group, LLC (an introducing broker) and is a member of the NFA in such capacity. Mr. Zelinski maintains an office at 9047 Poplar Avenue, Suite 101, Germantown, Tennessee, 38138, telephone number (901) 766-4446. As an Associated Person of Nesvick Trading Group, Mr. Zelinski handles the commodity futures trading for various customers on a discretionary basis. In such capacity, Mr. Zelinski holds responsibility for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business he conducted.

On March 1, 2005, the application of Mr. Zelinski with the NFA to become an Associated Person of Refco, LLC (a registered FCM) became effective. Refco LLC was later acquired by Man Financial Inc (a registered FCM), and Mr. Zelinski's Associated Person status with Man Financial Inc became effective November 28, 2005. Mr. Zelinski became a Branch Manager with Man Financial Inc on March 20, 2007. Man Financial Inc was later renamed to MF Global, Inc (a registered FCM), and Mr. Zelinski's registration as an Associated Person and Branch Manager was rolled to MF Global Inc effective January 1, 2008. As an Associated Person of Refco, LLC, Man Financial Inc, and MF Global Inc, Mr. Zelinski handled customer service duties for various commodity customer accounts and in his capacity as a branch manager (where applicable) Mr. Zelinski also was responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business. Mr. Zelinski's registration as an Associated Person and Branch Manager of MF Global Inc was withdrawn August 1, 2008.

On October 24, 2005, the application of Mr. Zelinski with the NFA to become an Associated Person of Nesvick Trading Group, LLC (a registered IB) became effective. Mr. Zelinski became a Branch Manager of Nesvick Trading Group on May 30, 2008. Mr. Zelinski's Branch Manager status was withdrawn on May 13, 2009. Mr. Zelinski became a Listed Principal of Nesvick Trading Group on May 21, 2009. As an Associated Person, Mr. Zelinski handled research and analysis for various commodity customers. As Branch Manager and later Listed Principal, Mr. Zelinski was responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business. Mr. Zelinski's status as Listed Principal of Nesvick Trading Group was withdrawn on January 24, 2011.

On January 13, 2011, Mr. Zelinski became a Listed Principal of the Advisor. On January 20, 2011, the application of Mr. Zelinski to become an Associated Person of the Advisor became effective. As an Associated Person and Listed Principal, Mr. Zelinski is responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the business conducted by the Advisor. Mr. Zelinski is also responsible for the trading decisions of the advisor.

The performance of the accounts of Mr. Zelinski over which he exercised discretion in his capacity as an Associated Person with Nesvick Trading Group can be found on page 18 of this document.

Thomas Nesvick ("Mr. Nesvick") is the President & Secretary of the Advisor and handles executive and corporate management functions for the Advisor from its office in Germantown, Tennessee. In April 1981, Mr. Nesvick was registered as an Associated Person of Garvey Commodities Corp, a registered FCM. Mr. Nesvick became a Principal of Garvey in October 1989. His association with Garvey ended in January 1992. As a Listed Principal of Garvey, Mr. Nesvick was responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business conducted by the firm as a FCM.

In January 1992, the application of Mr. Nesvick with NFA as an Associated Person of Refco LLC, a registered FCM, was approved. In March 1992, the applications of Mr. Nesvick with NFA to become an Approved Principal and Branch Manager of Refco LLC were approved. Mr. Nesvick served as an Approved Principal of Refco LLC until January 1995 and as an Associated Person and Branch Manager of Refco LLC until November 28, 2005. In this capacity, Mr. Nesvick worked with customers and provided order execution and research, among other services. As an Approved Principal and Branch Manager of Refco LLC, Mr. Nesvick was responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business conducted within his respective branch.

On October 24, 2005, Mr. Nesvick was approved by NFA as an Associated Person and Approved Principal of Nesvick Trading Group, LLC ("NTG"), a registered Introducing Broker for which Mr. Nesvick currently serves as Chief Executive Officer. In this capacity, Mr. Nesvick worked with customers and provided order execution and research, among other services. As an Approved Principal of Nesvick Trading Group, Nesvick is responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business conducted by the firm as an Introducing Broker.

On November 28, 2005, the application of Mr. Nesvick with NFA as an Associated Person of MF Global Inc., a registered FCM, was approved, and on December 6, 2005, his application as

Branch Manger of MF Global Inc. was approved. In this capacity, Mr. Nesvick worked with customers and provided order execution and research, among other services. As an Approved Principal and Branch Manager of MF Global Inc., Mr. Nesvick was responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the commodity futures business conducted within his respective branch. Mr. Nesvick served in these capacities with MF Global Inc. up until August 1, 2008.

On July 14, 2008, the application of Mr. Nesvick with the NFA to become a Listed Principal of Stag Trading, LLC, a registered CTA, became effective. On July 24, 2008, the application of Mr. Nesvick with the NFA to become an Associated Person of Stag Trading, LLC became effective. As a Listed Principal of Stag Trading, LLC, Mr. Nesvick is responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the business conducted by the firm as a CTA.

On November 6, 2008, the application of Mr. Nesvick with the NFA to become a Listed Principal of Global Ag, LLC, a registered CTA, became effective. On November 26, 2008, the application of Mr. Nesvick with the NFA to become an Associated Person of Global Ag, LLC became effective. As a Listed Principal of Global Ag, LLC, Mr. Nesvick is responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the business conducted by the firm as a CTA.

On July 12, 2010, Mr. Nesvick became a Listed Principal of Ditsch Trading, LLC (a registered CTA). On July 14, 2010, the application of Mr. Nesvick to become an Associated Person of Ditsch Trading, LLC became effective. Mr. Nesvick is responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the business conducted by Ditsch Trading, LLC.

On January 13, 2011, Mr. Nesvick became a Listed Principal of the Advisor. On January 20, 2011, the application of Mr. Nesvick to become an Associated Person of the Advisor became effective. Mr. Nesvick is responsible for supervision and compliance with NFA Rules and other laws and regulations pertinent to the business conducted by the Advisor. Mr. Nesvick will not handle trading decisions for the Advisor.

There have been no material administrative, civil, or criminal actions concluded within the preceding five years against the Advisor, Mr. Zelinski, or Mr. Nesvick.

TRADING OF PRINCIPALS' PERSONAL ACCOUNTS

The Principals (and those entities with whom they are affiliated (hereinafter the "Affiliates")) have traded commodity accounts in the past and will continue trading commodity interests for their own accounts. The records of any such trading will not be made available for inspection by any Client. Trading done by the Principals and the Affiliates may have different objectives than that of the Advisor, and such trading may differ from trading done for client commodity accounts.

PRINCIPAL RISK FACTORS

The risk of loss in trading commodity futures contracts can be substantial. You should therefore carefully consider whether such trading is suitable for you in light of your financial condition. Certain risks in trading commodities are due to volatility, leverage, and liquidity.

Commodity trading is speculative and volatile. Commodity interest prices are highly volatile. Price movements for commodity interests are influenced by, among other things: changing supply and demand relationships; weather; agricultural; trade, fiscal, monetary, and exchange control programs and policies of governments; US and foreign political and economic events and policies; changes in national and international interests rates and rates of inflation; currency devaluations and revaluations; and emotions of the marketplace. None of these factors can be controlled by the Advisor and no assurance can be given that the Advisor's advice will result in profitable trades for a client or that a client will not incur substantial losses.

Commodity trading is highly leveraged. The low margin deposits normally required in commodity interest trading (typically 2% to 15% of the value of the contract purchased or sold) permit an extremely high degree of leverage. Accordingly, a relatively small price movement in a contract may result in immediate and substantial losses to the investor. For example, if at the time of purchase 10% of the price of a futures contract is deposited as margin, a 10% decrease in the price of the contract would, if the contract is then closed out, result in a total loss of the margin deposit before any deductions for brokerage commissions. A decrease of more than 10% would result in a loss of more than the total margin deposit. Thus, like other leveraged investments, any trade may result in losses in excess of the amount invested. When the market value of a particular open position changes to a point where the margin on deposit in a client's account does not satisfy the applicable maintenance margin requirement imposed by the Futures Commission Merchant with whom the account is custodied ("FCM"), the client, and not the Advisor, will receive a margin call from the FCM. If the client does not satisfy the margin call within a reasonable time (which may be as brief as a few hours) the FCM will close out the client's position.

Commodity trading may be illiquid. Most US commodity exchanges limit price fluctuations in certain commodity interest prices during a single day by means of "daily price fluctuation limits" or "daily limits". The daily limit, which is set by most exchanges for all but a portion of the expiration month, imposes a floor and a ceiling on the prices at which a trade may be executed, as measured from the last trading day's close. While these limits were put in place to lessen margin exposure, they may have certain negative consequences for a customer's trading. For example, once the price of a particular contract has increased or decreased by an amount equal to the daily limit, thereby producing a "limit-up" or "limit-down" market, positions in the contract can neither be take or liquidated unless traders are willing to effect trades at or within the limit. Contract prices in various commodities have occasionally moved the daily limit for several consecutive days with little or no trading. Similar occurrences could prevent the CTA from promptly liquidating unfavorable positions and subject a client to substantial losses that could exceed the margin initially committed to such trades.

FCM may fail. Under CFTC regulations, FCM's are required to maintain customer's assets in a segregated account. If a customer's FCM fails to do so, the customer may be subject to risk of loss of funds in the event of bankruptcy. Even if such funds are properly segregated, the customer may still be subject to risk of loss of funds on deposit with the FCM should another customer of the FCM or the FCM itself fail to satisfy deficiencies in such other customers' accounts. Bankruptcy law applicable to all US futures brokers requires that, in the event the bankruptcy of such a broker, all property held by the broker, including certain property specifically traceable to the customer, will be returned, transferred, or distributed to the broker's customers only to the extent of each customer's pro-rata share of all property available for distribution to customers. If any futures broker retained by the customer were to become bankrupt, it is possible that the customer would be able to recover none or only a portion of its assets held by such futures broker.

Options are volatile and inherently leveraged, and sharp movements in prices could cause the Advisor to incur large losses. The Advisor may from time to time use options on futures contracts or on commodities. Options involve risks similar to futures, because options are subject to sudden price movements and are highly leveraged, in that payment of a relatively small purchase price, called a premium, gives the buyer the right to acquire an underlying futures contract, forward contract or commodity that has a face value substantially greater than the premium paid. The buyer of an option risks losing the entire purchase price of the option. The writer, or seller, of an option risks losing the difference between the purchase price received for the option and the price of the futures contract, forward contract or commodity underlying the option that the writer must purchase or deliver upon exercise of the option. There is no limit on the potential loss. Specific market movements of the futures contracts, forward contracts, or commodities underlying an option cannot accurately be predicted.

Trading systems involve proprietary methods. Because of specific elements of the Advisor's trading system are proprietary, a client will not be able to determine the full detail of the trading system or whether it is being followed.

Traded may be executed at different prices for different accounts. Trades may be executed at different times for different accounts. There is not guarantee that every client account will receive a trade at the price identified by the trading system or at the same price as other accounts.

Increase in assets under management may make profitable trading more difficult. The Advisor has not agreed with any party to limit the amount of additional equity it may manage, and is actively engaged in raising assets for existing and new accounts. The more equity that the Advisor manages means that it may be more difficult for the Advisor to trade profitably. This is because of the difficulty in trading larger positions without adversely affecting prices and performance. Accordingly, such increases in equity under management by the Advisor may require the Advisor to modify its trading decision and could have a detrimental effect on the accounts of clients. Such considerations may also cause the Advisor to eliminate smaller markets from consideration for inclusion in its various portfolios, reducing the range of markets in which trading opportunities may be pursued. The Advisor expressly reserves the right to reduce account size by returning assets or profits to clients in an effort to control asset growth. In addition, the Advisor may have an incentive to favor certain accounts because the compensation received from some other accounts may exceed the compensation it receives from certain other accounts. Because records with respect to other accounts are not accessible, an investor will not be able to determine if the Advisor is favoring other accounts.

Performance may vary from other accounts during the start of trading. A client's account may incur certain risks relating to the initial investment of its assets. Due to market conditions, the Advisor may take several days or months before a client's account is fully invested. Notwithstanding any delay in becoming fully invested, a client's account may commence trading operations at an unpropitious time, such as after sustained moves in a number of markets traded by the Advisor.

Personal liability of client. A client is personally liable for all losses including any which exceed the client's original deposit and any which exceed the equity in the program account. Clients can incur substantial losses due to, among other things, the volatility of price movements in commodity interests and the leverage inherent in the trading of commodity interests.

Electronic trading. The Advisor regularly places futures and options orders on electronic trading systems. Electronic trading and order routing creates risks associated with system failure. In the event of a system failure, it is possible that for a certain period the Advisor might not be able to enter new orders, cancel or modify existing orders, and lose on order priority which could in turn cause potential losses. To mitigate some of this risk, the Advisor utilizes several different order entry systems, and in the event one fails another could be used. The Advisor also maintains access to exchange-floor personnel in the event pit-traded execution is necessary.

DESCRIPTION OF THE DIVERSIFIED FUTURES TRADING PROGRAM

Pursuant to a Trading Advisory Agreement, clients will grant the Advisor sole discretionary authority to direct, without the prior approval of the client, utilization of the assets and funds of the client's account in the purchase and sale of commodity futures contracts. Brokerage commissions arising from the trading of the clients account will be charged to the account at such rate or rates as the commodity broker publishes and charges for nonmember speculative accounts, or such lower rates as may be agreed upon between the client and the commodity broker. The current minimum for new accounts is US$100,000.

Mr. Zelinski trades futures on a wide range of markets, including agriculture, finance, energy, and others. Mr. Zelinski's primary focus is in agricultural commodities, and specifically grains and oilseeds. Mr. Zelinski has gained a thorough knowledge of these markets while working with Nesvick Trading Group as the primary research analyst for grain and oilseed markets. Mr. Zelinski has traveled around the country to study crop development, as well as to gain a knowledge of US cash grain and oilseed markets. Mr. Zelinski's fundamental analysis also includes forecasting US and world supply and demand tables, monitoring of US and world weather, studying domestic and international freight values, and tracking underlying cash values associated with agricultural futures markets.

Mr. Zelinski also closely monitors developments in world currency values and political events that can have an influence on global trade flows. In addition to this analysis's influence on his agricultural trading strategies, Mr. Zelinski will also use this analysis in trading various currency, financial, metal, and energy contracts.

Technical/chart analysis is used very rarely, and generally only to help determine entrance and exit points. Options are frequently used to enhance potential revenue and/or to manage risk. Mr. Zelinski is comfortable in trading from both the long and short side of all futures markets.

THERE IS NO ASSURANCE THAT ANY PROFIT WILL BE PROVIDED TO THE INVESTORS IN THE TRADING AS A RESULT OF THESE TRADING METHODS BY THE COMMODITY TRADING ADVISOR. No participant will acquire any rights or proprietary interest in, or have access to any of the information, data, or trading methods utilized by the Advisor.

DESCRIPTION OF INTERESTS TRADED

The Advisor may trade any variety of commodity interest on regulated exchanges that may included, but are not limited to grains, meats, metals, minerals, currencies, financial market indices, energy related materials and other items of food and fiber, money market instruments, and items that are now, or may hereinafter be, the subject of futures contract trading, options contracts, or physical commodities trading or derivatives or other contracts on such items or instruments (collectively "commodity interests"). The markets available for inclusion in the portfolio will normally be limited to sufficiently liquid commodity interests and may evolve over time as the requirements for portfolio balance and liquidity change. Markets traded by Mr. Zelinski prior to his association with the Advisor, and those which are to be traded by the Advisor include, but are not limited to the following.

US Physical Derivative Markets

Crude Oil	(New York Mercantile Exchange)
Heating Oil	(New York Mercantile Exchange)
Unleaded Gasoline	(New York Mercantile Exchange)
Natural Gas	(New York Mercantile Exchange)
Coffee	(New York Board of Trade)
Cotton	(New York Board of Trade)
Sugar	(New York Board of Trade)
Corn	(Chicago Board of Trade)

Soybean Oil	(Chicago Board of Trade)
Soybean Meal	(Chicago Board of Trade)
Wheat	(Chicago Board of Trade)
Soybeans	(Chicago Board of Trade)
Live Cattle	(Chicago Mercantile Exchange)
Lean Hogs	(Chicago Mercantile Exchange)
Gold	(NYMEX / Commodity Exchange Center)
Silver	(NYMEX / Commodity Exchange Center)

US Financial Derivative Markets

US 30 Year Bond	(Chicago Board of Trade)
US 10 Year Bond	(Chicago Board of Trade)
US 5 Year Bond	(Chicago Board of Trade)
S&P 500	(Chicago Mercantile Exchange)
Eurodollars	(Chicago Mercantile Exchange)
Japanese Yen	(Chicago Mercantile Exchange)
Euro Currency	(Chicago Mercantile Exchange)
British Pound	(Chicago Mercantile Exchange)
Swiss Franc	(Chicago Mercantile Exchange)
Australian Dollar	(Chicago Mercantile Exchange)
Canadian Dollar	(Chicago Mercantile Exchange)

LIMITATION OF ADVISOR'S LIABILITY

The Trading Advisory Agreement provides that the Advisor shall not be liable to a client for any actions taken with respect to a commodity account if the Advisor acted in good faith and in a manner reasonably believed to be in, or not opposed to the best interest of the client. The Trading Advisory Agreement further provides that such actions do not include gross negligence, willful or wanton misconduct, or a breach of fiduciary obligations to the client by the Advisor. The Trading Advisory Agreement, consequently, provides that Advisor shall be indemnified and held harmless in the above described circumstances.

FUTURES COMMISSION MERCHANT AND INTRODUCING BROKER

Clients of the Advisor may select at their choice any Futures Commission Merchant ("FCM") with which to maintain their accounts, subject to the Advisor's approval. Clients may also select an Introducing Broker ("IB") to introduce the client's account to the FCM. In the event that the Client does not select an IB, the Advisor will utilize Nesvick Trading Group ("NTG") as its IB. Utilizing NTG as the IB poses a potential conflict of interest as NTG will receive a portion of the commissions paid for trading in accounts of the Advisor.

The FCM selected by the client will be responsible for holding and maintaining all customer funds, securities, commodities, and other properties, providing a daily written record of any trading activity as well as month end report of all open positions held in the account and their value. Brokerage fees and other charges to the client's accounts are negotiated between the FCM or IB and the client. The Advisor anticipates commission rates will range between $4 to $10 per round turn plus fees, with NTG's portion of commissions included in this range. These additional fees would include FCM fees, exchange fees, and regulatory fees.

Advisor reserves the right to reject any FCM or IB requested by a client for any reason, including the belief that its execution and or back office service is not satisfactory or the commission or fees charged to a client are not satisfactory.

Advisor reserves the right to direct certain trades to brokers other than the client's clearing broker. In some cases this is necessary for most or all of the client's trades because of the refusal or inability of the carrying broker to meet the Advisor's requirements to be an executing broker. The clearing broker will then pay additional brokerage and "give-up" fees from the client's account to the executing broker. The give-up fee should not exceed $2 per side. This may also be done when the Advisor feels the net costs or proceeds of the transaction will be better for the client than what would be obtained form his clearing broker.

FEES PAID TO THE ADVISOR

Accounts directed by the Advisor will be charged an advisory fee as set forth in the Trading Advisory Agreement between the Advisor and each client. Such fees generally consist of a monthly management fee of 2% per annum of Net Asset Value of the account and an incentive fee of 20% of the Trading Gains. The management fee is accrued beginning with the first day of the month in which an account is opened and the full fee may be charged for services rendered during any portion of a month in which the Trading Advisory Agreement is terminated.

The "Net Asset Value" of the account is defined as total assets minus total liabilities, determined in accordance with generally accepted accounting principles, except that (i) total liabilities will exclude accrued management and incentive fees and (ii) the Net Asset Value will not be reduced by the amount of any distributions or withdrawals during such period. Each position in a commodity interest is accounted for at fair market value at the close of trading each day. Beginning with the month an account is opened, each month a portion of the management fee will be accrued based on the Net Asset Value of the account on the last day of the month and may be payable monthly at the option of the Trading Advisor. For partially funded accounts, Net Assets will also include the notional portion of the account that has not been funded.

Trading Gain is defined as the increase, if any, in the value of the Account managed by the Advisor arising out of commodity trading activity, including interest earned on such Account and any unrealized gains or losses in open commodity positions (after deductions of round turn brokerage commissions and management fees) as of the end of each month over the value of such Account as of the previous month (or the commencement of trading, whichever is higher) adjusted for withdrawals and additions to the account. Incentive fees on trading gains will be deducted quarterly.

Subject to the limitations set forth above, if any incentive fee is paid to the Advisor and the account thereafter declines in value for any subsequent quarter, the Advisor will retain all fees previously paid. However, no subsequent fee would be payable until the value of the account, adjusted for withdrawals and additions, exceeds the end of the quarter value of the prior highest quarterly value.

CONFLICTS OF INTEREST

The Advisor, the Affiliates and the Principals may engage in other business activities and manage the accounts of other clients, including those of collective investment vehicles. The investment strategy for such other clients may vary from, be the same as or be similar to the current strategy employed by the Advisor. As a result, the Advisor and the Principals may have conflicts of interest in allocating management time, services, and functions among other business ventures. The Advisor will not receive preferential treatment with respect to the allocation of investment opportunities. Neither the Advisor, the Affiliates nor the Principals are required to refrain from any other activity nor disgorge any profits from any such activity, including acting as a portfolio manager or managing agent for investment vehicles with objectives similar to or different from those of the Advisor.

The Advisor, the Affiliates and the Principals may also engage in other business activities that may compete with the Advisor for investors or Commodity Interests. Moreover, the Principals may serve as managing members or directors of other collective investment vehicles that may compete with the Advisor for investors or Commodity Interests.

The Advisor, the Affiliates and the Principals presently trade in commodities futures contracts for their personal and proprietary accounts and will continue to do so. In this connection, the Advisor's orders for clients may be executed in competition with the orders for other accounts managed by the Advisor and/or the Principals, including their own accounts. However, when initiating the same position in client accounts and proprietary accounts, client account orders are entered prior to proprietary account orders whenever practicable. All open positions of accounts managed by the Advisor will be aggregated for the purpose of determining positions limits prescribed by the CFTC and the exchanges on which such accounts are traded. Accordingly, accounts managed by the Advisor might be unable to enter or hold certain positions if such positions, when added to positions held by the Advisor's other accounts, would exceed applicable limits.

Mr. Nesvick is a principal of the Advisor and a principal of Nesvick Trading Group. Mr. Zelinski is a principal of the Advisor and also an Associated Person of Nesvick Trading Group, LLC. This is a potential conflict of interest as there could be an incentive to overtrade client accounts in order to generate commissions for Nesvick Trading Group. Nesvick Trading Group may receive a portion of the commissions described in the "Futures Commission Merchant and Introducing Broker" section above. NTG's portion of these fees could range from 20-80%. As the Advisor is paid through an incentive fee, there may also be an incentive to initiate riskier trades in an attempt to generate higher fees.

Account owners will not be permitted to inspect the trading of the Advisor or of other accounts managed by the Advisor. To avoid a conflict of interest, the Principals will not seek to intentionally take positions in his personal or proprietary accounts that are opposite those taken for the managed accounts of clients.

ACKNOWLEDGMENT OF RECEIPT OF DISCLOSURE DOCUMENT

Clients will be required to acknowledge in writing in the Commodity Trading Advisory Agreement that they have received a copy of this Disclosure Document.

PERFORMANCE HISTORY

Set forth in the following performance capsules are the results of the accounts traded by Mr. Zelinski on a discretionary basis. The information set forth in the Performance History is unaudited.

As of February 23, 2011, no account of Mr. Zelinski has been closed. Of the open accounts as of February 23, 2011, 8 were profitable and none were unprofitable.

The Principal's personal and proprietary accounts are excluded from the Performance History because they may be traded differently from client accounts. At any given time, such accounts may be (i) used for hedging a stock portfolio, (ii) day traded actively, (iii) used to test various market strategies and (iv) traded more aggressively. As a result, the performance of such accounts may be significantly different from client accounts at any given time and may skew the performance table.

PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS AND NO REPRESENTATION IS MADE THAT MANAGED ACCOUNTS IN THE FUTURE WILL ACHIEVE PROFITS SIMILAR TO THOSE SHOWN. NO ASSURANCE CAN BE MADE THAT LOSSES WILL NOT BE INCURRED.

NOTES TO THE PERFORMANCE HISTORY CAPSULE

Of David Zelinski, an AP of Nesvick Trading Group, LLC.

Capsule A – Represents accounts opened by Mr. Zelinski on a discretionary basis outside of Opus Futures, LLC. These clients will continue to utilize the trading services of Mr. Zelinski, and have not changed the trading strategies. These accounts are not traded pursuant to the offered program of Opus Futures, LLC, and as such were not adjusted for the management and incentive fee structure described in this document. The Advisor will not assume discretionary trading control of these accounts. Mr. Zelinski will continue to maintain discretionary trading authority over these accounts in his capacity as an Associated Person of Nesvick Trading Group, LLC.

THIS TRADING ADVISOR PREVIOUSLY HAS NOT DIRECTED ANY ACCOUNTS.

PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS AND NO REPRESENTATION IS MADE THAT MANAGED ACCOUNTS IN THE FUTURE WILL ACHIEVE PROFITS

SIMILAR TO THOSE SHOWN. NO ASSURANCE CAN BE MADE THAT LOSSES WILL NOT BE INCURRED.

Beginning Net Asset Value ("BNAV") is the total capital available for trading as of the beginning of the period including notional funds. Such value represents all assets, less all liabilities, with open commodity positions accounted for at fair market value including accrued brokerage commissions on open positions.

Total Nominal Equity is the aggregate of actual assets included in the BNAV and notional equity assigned to the account.

Contributions/Withdrawals are funds the participant paid in or received from its account.

Brokerage Commissions are the amounts of brokerage commissions and NFA and exchange fees on all trades closed out during the period combined with the change in anticipated brokerage commission on open positions.

Net Performance equals Net Realized and Unrealized Gain (Loss) plus Interest Income.

Rate of Return (fully funded subset method) equals the Net Performance of fully funded accounts for the period divided by the period's BNAV of the same accounts.

Drawdowns are losses experienced by a trading program or pool over a specified period.
Worst peak-to-valley drawdowns are the greatest cumulative percentage decline in month-end net asset value due to losses sustained by a trading program during a period in which the initial month-end net asset value is not equaled or exceeded by a subsequent month end net asset value.

Trading Account A:

Percentage rate of return (computed on a compounded monthly basis)	2011	2010	2009	2008
January	10.80%	18.36%	-4.38%	
February		-13.20%	7.07%	
March		9.28%	4.48%	-13.35%
April		-13.75%	-4.61%	11.12%
May		17.69%	17.00%	-7.68%
June		3.07%	0.86%	34.32%
July		-15.64%	-1.28%	0.14%
August		7.70%	5.73%	0.38%
September		30.23%	4.29%	-8.02%
October		27.74%	-0.10%	19.60%
November		-5.68%	-10.97%	7.11%
December		26.83%	18.02%	0.00%
Year	10.80%	112.38%	37.18%	41.41%

Name of Trading Principal: David Zelinski
Name of Trading Program: Trading Account A
Inception of Trading by Mr. Zelinski: March 2008
Number of accounts traded by Mr. Zelinski: 8
Number of accounts traded pursuant to Trading Account A: 8
Total actual assets traded by Mr. Zelinski: $2,416,300
Total nominal equity (actual plus notional) traded by Mr. Zelinski: $2,016,321
Worst Monthly Percentage Drawdown: -15.64% (July 2010)
Worst Peak-to-Valley Drawdown: -18.19% (January 2010 – April 2010)

PAST PERFORMANCE IS NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

*Drawdown: Losses experienced by the trading program over a specified period.

SPECIAL DISCLOSURE FOR NOTIONALLY FUNDED ACCOUNTS

YOU SHOULD REQUEST YOUR COMMODITY TRADING ADVISOR TO ADVISE YOU OF THE AMOUNT OF CASH OR OTHER ASSETS (ACTUAL FUNDS) WHICH SHOULD BE DEPOSITED TO THE ADVISOR'S TRADING PROGRAM FOR YOUR ACCOUNT TO BE CONSIDERED "FULLY FUNDED". THIS IS THE AMOUNT UPON WHICH THE ADVISOR WILL DETERMINE THE NUMBER OF CONTRACTS WHICH WILL BE TRADED IN YOUR ACCOUNT AND SHOULD BE AN AMOUNT SUFFICIENT TO MAKE IT UNLIKELY THAT ANY FURTHER CASH DEPOSITS WOULD BE REQUIRED FROM YOU OVER THE COURSE OF YOUR PARTICIPATION IN THE ADVISOR'S PROGRAM.

YOU ARE REMINDED THAT THE ACCOUNT SIZE YOU HAVE AGREED TO IN WRITING (THE "NOMINAL" OR "NOTIONAL" ACCOUNT SIZE) IS NOT THE MAXIMUM POSSIBLE LOSS THAT YOUR ACCOUNT MAY EXPERIENCE.

YOU SHOULD CONSULT THE ACCOUNT STATEMENTS RECEIVED FROM YOUR FUTURES COMMISSION MERCHANT IN ORDER TO DETERMINE THE ACTUAL ACTIVITY IN YOUR ACCOUNT, INCLUDING PROFITS, LOSSES AND CURRENT CASH EQUITY BALANCE. TO THE EXTENT THAT THE EQUITY IN YOUR ACCOUNT IS AT ANY TIME LESS THAN THE NOMINAL ACCOUNT SIZE YOU SHOULD BE AWARE OF THE FOLLOWING:

1. ALTHOUGH YOUR GAINS AND LOSSES, FEES AND COMMISSION MEASURED IN DOLLARS WILL BE THE SAME, THEY WILL BE GREATER WHEN EXPRESSED AS A PERCENTAGE OF ACCOUNT EQUITY. FOR EXAMPLE, THE 2% PER ANNUM MANAGEMENT FEES PAID ON A FULLY FUNDED TRADING ACCOUNT WOULD ACTUALLY BE 4% ON ACCOUNT THAT IS 50% FUNDED.

2. YOU MAY RECEIVE MORE FREQUENT AND LARGER MARGIN CALLS.

3. THE CAPSULE PERFORMANCE MAY BE USED TO CONVERT THE RATES OF RETURN ("ROR") IN THE GRAPH TO THE CORRESPONDING RORs FOR PARTICULAR FUNDING LEVELS.

4. CASH ADDITIONS TO AND WITHDRAWALS FROM THE ACCOUNT SHALL AFFECT THE NOMINAL SIZE OF THE ACCOUNT DOLLAR FOR DOLLAR UNLESS SPECIFIED IN WRITING. LIKEWISE, NET PERFORMANCE AFFECTS THE NOMINAL SIZE OF THE ACCOUNT DOLLAR FOR DOLLAR UNLESS SPECIFIED OTHERWISE.

FUNDING LEVELS

USE THE MATRIX BELOW TO CONVERT THE RATE OF RETURN ("ROR") FROM THE TABLE TO THE RATE OF RETURN EXPERIENCED BY PARTIALLY FUNDED ACCOUNTS AT VARIOUS FUNDING LEVELS. AN ACCOUNT IS CONSIDERED PARTIALLY FUNDED WHEN AN ACCOUNT HAS ACTUAL FUNDS AND NOTIONAL FUNDS. FOR EXAMPLE, AN ACCOUNT THAT DEPOSITS $500,000 OF ACTUAL CASH AND ASSIGNS ANOTHER $500,000 OF NOTIONAL FUNDS IS CONSIDERED 50% FUNDED. AFTER YOU HAVE DETERMINED THE ROR YOU WANT TO CONVERT TO YOUR PARTICULAR FUNDING LEVEL, MULTIPLY (X) BY THE APPLICABLE FACTOR (4 FOR 25%, 2 FOR 50%, ETC.)

	(Sample Monthly Rates of Return)								
		-16.00%	-8.00%	-1.00%	0.00%	6.00%	9.00%	15.00%	27.00%
	100.00%	-16.00%	-8.00%	-1.00%	0.00%	6.00%	9.00%	15.00%	27.00%
Funding	90.00%	-17.78%	-8.89%	-1.11%	0.00%	6.67%	10.00%	16.67%	30.00%
Levels	80.00%	-20.00%	-10.00%	-1.25%	0.00%	7.50%	11.25%	18.75%	33.75%
	70.00%	-22.86%	-11.43%	-1.43%	0.00%	8.57%	12.86%	21.43%	38.57%
	60.00%	-26.67%	-13.33%	-1.67%	0.00%	10.00%	15.00%	25.00%	45.00%
	50.00%	-32.00%	-16.00%	-2.00%	0.00%	12.00%	18.00%	30.00%	54.00%
	25.00%	-64.00%	-32.00%	-4.00%	0.00%	24.00%	36.00%	60.00%	108.00%

THE ABOVE EXAMPLE SHOWS HOW A MONTHLY ROR OF -1.00% CAN BE CONVERTED TO THE ROR EXPERIENCED BY AN ACCOUNT AT VARIOUS FUNDING LEVELS. AN ACCOUNT WHICH IS 25% FUNDED WOULD HAVE EXPERIENCED A ROR -4.00% (-1.00% MULTIPLIED BY 4)

Opus Futures, LLC

Commodity Trading Advisor

Acknowledgement

I hereby acknowledge receipt of the Disclosure Document of Opus Futures, LLC, including performance history for David Zelinski, dated February 23, 2011.

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Account Name

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Authorized Signature

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Date