

Inception	Nov	YTD
2019	-4.90%	-17.01%

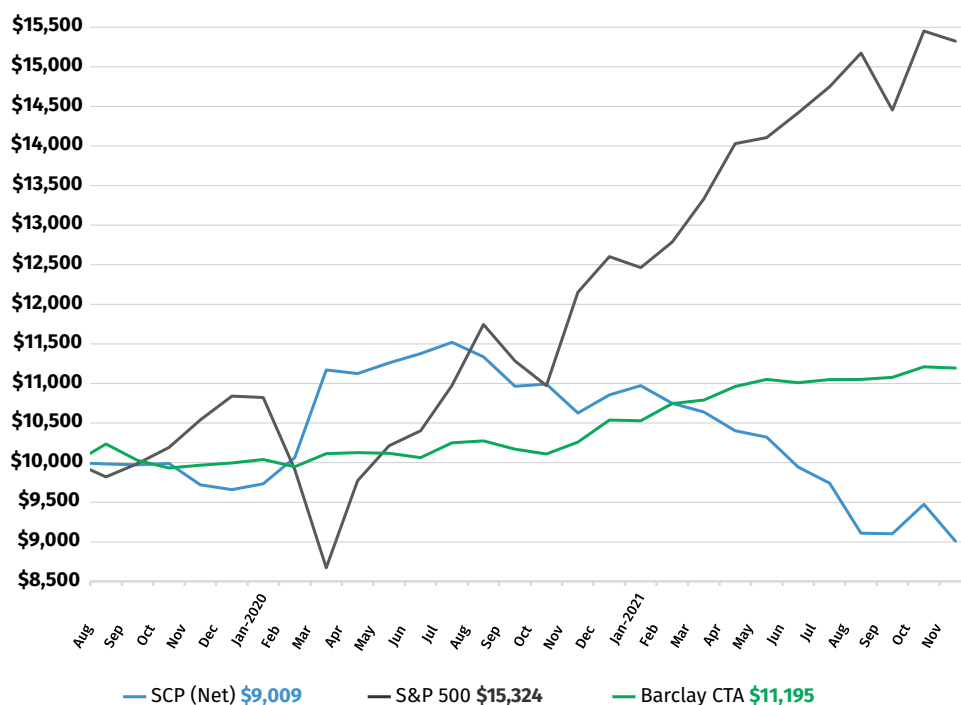
Objective

The Strategic Commodities Program (SCP) seeks portfolio diversification and strong capital appreciation that is uncorrelated with major market indices by exploiting both contrarian and persistent directional moves in the markets. The program trades exchange-listed futures contracts, which are taxed at more favorable rates than equities or fixed income securities.

Investment Strategy

- › We have been trading the Strategic Commodities Program in our proprietary trading account live since August 2019 and now offer it to investors who want to add diversification to their portfolios through bidirectional exposure to commodities.
- › The program is positioned to capitalize on patterns of both persistent directionality and mean-reversion in the most liquid commodity markets including energy, metals, softs, and rates.
- › SCP employs a machine learning approach known as Swarm Intelligence to systematically monitor, rank, and rebalance between multiple purpose-built alpha-seeking trading strategies that exploit bullish and bearish market opportunities across multiple time frames and market complexes.
- › The breath of alpha styles, time frames, and markets available to the programs, paired with timely monitoring of alpha-source momentum, combine for a program capable of adapting to market conditions.
- › The program has the ability to be profitable in both up and down markets.
- › Positions taken may be long, short, flat (no exposure) or a combination thereof based on our models.
- › The program uses a risk parity concept to construct portfolios, which produces, over time, a more balanced return profile across markets traded.
- › Risk controls include limits on market exposure, position-sizing using risk-parity, and diversification by sector and strategy.

Growth of \$10,000



Past performance is not necessarily indicative of future results.

Performance & Risk Statistics

	SCP (Net)	S&P 500	Barclay CTA
Cumulative Return	-9.91%	53.24%	11.95%
Annualized Return	-4.37%	20.07%	4.96%
Annualized Volatility	11.23%	18.13%	3.90%
Sharpe Ratio	-0.39	1.11	1.27
Sortino Ratio	-0.69	1.43	2.41
Alpha (vs. S&P 500)	1.10%	-	4.22%
Beta (vs. S&P 500)	-0.27	-	0.04
Correlation (vs. S&P 500)	-0.44	-	0.17
Correlation (vs. Barclay CTA)	0.21	0.17	-
% of Positive Months	39.29%	67.86%	64.29%
Maximum Drawdown	-21.79%	-20.00%	-2.96%

Trading Program Highlights

Program	Strategic Commodities Program (SCP)
Manager	Strategic Capital Advisors, LLC
Inception Date	August 2019
Management Fee	2%
Incentive Fee	20%
High-Water Mark	Yes
Minimum Investment	Standard \$500,000 / Institutional \$1.5 million
Accredited Investors	QEP
Investment Types	Separately Managed Account

Monthly Performance

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	YTD	SP 500	CTA*
2021	1.08	-2.03	-1.02	-2.23	-0.77	-3.68	-2.03	-6.51	-0.06	4.08	-4.90	-	-17.01	21.59	6.23
2020	0.78	3.40	11.00	-0.40	1.21	1.05	1.25	-1.60	-3.27	0.26	-3.34	2.16	12.40	16.26	5.42
2019	-	-	-	-	-	-	-	-0.18	-0.10	0.17	-2.70	-0.63	-3.42	8.40	-0.04

*Barclay CTA Index

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Want to Learn More?

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Performance Disclosure

The historical performance has been retroactively adjusted on a pro-forma basis to approximately reflect the fee structure of the program being offered, including an annual 2% management fee and an incentive fee of 20%. Pro forma performance results have many inherent limitations, some of which are described below. No representation is being made that any account will or is likely to achieve profits or losses similar to those shown. In fact, there are frequently sharp differences between pro forma results and the actual results achieved by any particular trading program. One of the limitations of pro forma performance results is that they are generally prepared with the benefit of hindsight.

Disclaimer

Past performance is not necessarily indicative of future results. The advisor’s trading program involves substantial risks and investments can be made on the basis of a trading advisory agreement. The risk of loss in trading commodities and futures can be substantial.

PURSUANT TO AN EXEMPTION FROM THE COMMODITY FUTURES TRADING COMMISSION IN CONNECTION WITH ACCOUNTS OF QUALIFIED ELIGIBLE PERSONS, THIS ACCOUNT DOCUMENT OR BROCHURE OF THE TRADING ADVISOR IS NOT REQUIRED TO BE, AND HAS NOT BEEN, FILED WITH THE COMMISSION. THE COMMODITY FUTURES TRADING COMMISSION DOES NOT PASS UPON THE MERITS OF PARTICIPATING IN A TRADING PROGRAM OR UPON THE ADEQUACY OR ACCURACY OF THE COMMODITY TRADING ADVISORS DISCLOSURE INFORMATION. CONSEQUENTLY, THE COMMODITY FUTURES TRADING COMMISSION HAS NOT REVIEWED OR APPROVED THIS TRADING PROGRAM OR THIS ACCOUNT.

Prior to May 2020, Strategic Capital Advisors, LLC was called Paskewitz Asset Management LLC.

Management

Chairman TSF

Robb Rill

- › Founder of The Strategic Group PR (1998), headquartered in Dorado Beach, Puerto Rico
- › **Managing Director**, The Strategic Funds, LLC
- › **Manages a proprietary fund, Strategic Capital**, with an emphasis on short-selling securities and identifying microcap fraud in the market
- › Used his experience and expertise to uncover mispricing and fraud and expose them through the media to the SEC
- › **His fund achieved outsized alpha** from 1998 to 2005 before short selling restrictions hampered his main strategy.
- › As one of the pioneer recipients of new tax incentive laws in Puerto Rico intended to incentivize asset managers to relocate to Puerto Rico in exchange for a 4% tax rate, he was one of the first ten recipients to move to the island in 2013
- › **Founder of The 20/22 Act Society**, an organization with several hundred members, which has become the epicenter for tax grant recipients which are primarily but not exclusively hedge funds and private equity firms seeking to take advantage of these new programs
- › Work has been profiled in several prominent publications including Bloomberg, Business Week, and Reuters
 - › **MBA** – University of Florida – Finance
 - › **BS** – University of Florida – Business Administration

CIO

Nikolas Joyce

- › 20 years’ experience building investment research infrastructure and systematic trading platforms using leading edge tools such as artificial intelligence, machine learning and SWARM intelligence technologies
- › Former Portfolio Manager and Principal-head of derivatives research and hedging operations for a Commodity Trading Advisor
- › Former Cross-Asset Portfolio Manager and Principal managing funds in excess of \$350 million
- › University of British Columbia–B.C.Finance.