

CFTC Risk Disclosure Statement

THE RISK OF LOSS IN TRADING COMMODITIES CAN BE SUBSTANTIAL. YOU SHOULD THEREFORE CAREFULLY CONSIDER WHETHER SUCH TRADING IS SUITABLE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. THE HIGH DEGREE OF LEVERAGE THAT IS OFTEN OBTAINABLE IN COMMODITY 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. THE DISCLOSURE DOCUMENT CONTAINS A COMPLETE DESCRIPTION OF THE PRINCIPAL RISK FACTORS AND EACH FEE TO BE CHARGED TO YOUR ACCOUNT BY THE COMMODITY TRADING ADVISOR ("CTA").

THE REGULATIONS OF THE COMMODITY FUTURES TRADING COMMISSION ("CFTC") REQUIRE THAT PROSPECTIVE CUSTOMERS OF A CTA RECEIVE A DISCLOSURE DOCUMENT WHEN THEY ARE SOLICITED TO ENTER INTO AN AGREEMENT WHEREBY THE CTA WILL DIRECT OR GUIDE THE CLIENT'S COMMODITY INTEREST TRADING AND THAT CERTAIN RISK FACTORS BE HIGHLIGHTED. THIS DOCUMENT IS READILY ACCESSIBLE AT THIS SITE. THIS BRIEF STATEMENT CANNOT DISCLOSE ALL OF THE RISKS AND OTHER SIGNIFICANT ASPECTS OF THE COMMODITY MARKETS. THEREFORE, YOU SHOULD PROCEED DIRECTLY TO THE DISCLOSURE DOCUMENT AND STUDY IT CAREFULLY TO DETERMINE WHETHER SUCH TRADING IS APPROPRIATE FOR YOU IN LIGHT OF YOUR FINANCIAL CONDITION. YOU ARE ENCOURAGED TO ACCESS THE DISCLOSURE DOCUMENT BY CLICKING THE LINKS PROVIDED AT [FORMS.ALTAVRA.COM](https://forms.altavra.com). YOU WILL NOT INCUR ANY ADDITIONAL CHARGES BY ACCESSING THE DISCLOSURE DOCUMENT. YOU MAY ALSO REQUEST DELIVERY OF A HARD COPY OF THE DISCLOSURE DOCUMENT AT [FORMSBYMAIL.ALTAVRA.COM](https://formsbymail.altavra.com), WHICH WILL ALSO BE PROVIDED TO YOU AT NO ADDITIONAL COST. THE CFTC HAS NOT PASSED UPON THE MERITS OF PARTICIPATING IN ANY OF THESE TRADING PROGRAMS NOR ON THE ADEQUACY OR ACCURACY OF ANY OF THESE DISCLOSURE DOCUMENTS.

QUESTIONS OR COMMENTS: PLEASE EMAIL CLIENTSERVICES@ALTAVRA.COM OR CALL 1-800-998-7870.

For up-to-date performance information on 90+ managed accounts, please access the alternative investment database*.

To access the database:

1. Request a pin number at altavra.com.
2. After you receive your pin number, you can access the database at portfolio.altavra.com.
3. In the database, click on "List of Programs" at the top of the page to view all of the programs in the database.

*PLEASE NOTE: There is no fee to access the database. This is not a trial access. The pin number does not expire.

THE RISK OF LOSS IN TRADING FUTURES, OPTIONS AND OFF-EXCHANGE FOREX CAN BE SUBSTANTIAL.
PAST RESULTS ARE NOT NECESSARILY INDICATIVE OF FUTURE RESULTS.

Pacific Capital Advisors

Program Description

Robert J. Hartman's trading methods are proprietary and confidential. The following description is of necessity and is not intended to be exhaustive.

The Advisor will employ only technical analysis in making trading decisions. Technical analysis is not based on the anticipated supply and demand of cash (actual) commodity; instead, it is based on the theory that a study of the markets themselves will provide a means of anticipating futures prices. Technical analysis of the markets often includes a study of the actual intraday daily, weekly and monthly price volume and open interest data, utilizing charts and or computers for analysis of these items.

Pacific Capital Advisors has developed a series of proprietary computerized trading systems that generate trading signals. Buy and sell orders are placed in the various markets traded based upon these signals.

Program Description: Trading Systems

The computerized trading systems are designed to respond to short-term market fluctuations that may last only a portion of a day, or up to several days. Both momentum and mean reversion trading techniques are employed across a variety of futures markets. Employing stop loss levels, time exits and diversification across sectors and geographical regions controls risk. Emphasis is placed on preservation of capital. The capital at risk per trade is planned in advance and strictly adhered to.

These aforementioned short-term trading systems are used in the following program as described below.

The Vanguard Trading Program

Vanguard is an intraday program trading a variety of systems with holding periods of less than one hour to one session. Trades are not held overnight thereby eliminating the risk of overnight price shocks. Momentum and mean reversion methods are used. Contracts traded are typically limited to U.S. stock indices and energies. This program tends to have a low correlation with other managed futures programs.

Management Information

Robert Hartman has an extensive background in the information technology field. He had technical and management roles at IBM, Sun Microsystems, Computer Sciences Corp (CSC), Conner Peripherals, Seagate Technologies and Logitech Inc. Then, from August 1999 to October 2000, he was a project manager, and a consultant, involved with network and systems security for Apple Computer. It was during this time that he began developing the trading methodologies that he is offering herein. Then from October of 2000 and still continuing, he is the President of Trilocom, Inc. This corporation, of which he is the only principal, was created in Mountain View, CA specifically as a trading firm,

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trading his own accounts as he further refined his trading systems. He then formed and registered Pacific Capital Advisors, Inc., the CTA of this disclosure document. The performance records for the firm and its principals begin on page 10 of this document. Mr. Hartman became registered as an Associated Person with Vankar Trading Corporation an Introducing Broker, in November of 2007 and listed as a Branch Office Manager of Vankar Trading Corporation in January 2008.

The descriptions above are from the manager's disclosure document.

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