

May 25, 2010

Mr. Gary Gensler  
Chairman  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, NW  
Washington, DC 20581

CC: Commissioner Dunn  
Commissioner O'Malia  
Commissioner Sommers  
Commissioner Chilton

Dear Chairman Gensler:

We are very disappointed that recent United States Legislative efforts may result in the demise of the much anticipated market in the Domestic Box Office Receipts futures contracts. These contracts were to be an important factor in our proposal to investors in our newly formed feature film development and production company. It was our hope to raise between \$100 to \$500 million to produce and distribute films over the next 20 years or longer. Without the DBOR market, and the benefits for our investors which we outline below, we may not be able to raise the funds needed.

First, a bit of my history and experience in financial services that I feel is pertinent and important to your understanding of how we came to know and value the role that the DBOR's could play in the movie industry. I worked on the NYSE trading floor for ten years then moved to Fidelity Investments where I co-lead a division that was at the forefront of electronic trading of equities and options. As Director and Principal of the National Financial Services unit, I was responsible for the direction of electronic order flow firm-wide. In that capacity I met regularly with Senior Portfolio Managers, Plan Sponsors and traders across the United States. Since Fidelity I have held senior positions or owned successful financial service companies with multiple business lines including investment banking, research sales and trading, and as a registered investment advisor. I currently own a FINRA regulated broker dealer and an SEC regulated investment advisory firm.

As an outgrowth of my financial services experiences, I have been researching the entertainment sector as an alternative asset class and examined several Film Fund and Film Company models i.e., IndieVest, DF Indie Studios. As we created our own business model and followed the progress of Cantor's DBOR trading platform it became clear that by including the benefits and intelligent use DBOR's in our Business Plan, we could attract investors that may not otherwise invest in the film industry.

We understand the pressure Congress is under to regulate certain activities on Wall Street. But it should be clear to members that any and all products and practices that lead to our current troubles stemmed from lack of transparency and proper disclosures and in areas that were outside the jurisdiction of appropriate regulatory bodies. Our hope is that

Congress does not “throw the baby out with the bathwater”. Under the CFTC, the proposed DBOR market would be: an objectively “verifiable” commodity that is to be traded, have standardized terms, have a clearing mechanism, and importantly, open, easy access by means of the Cantor Exchange.

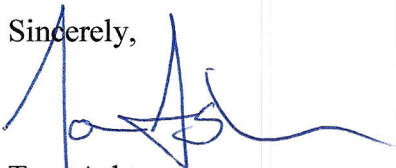
The benefits of using film related futures contracts, DBORs, as outlined in our film company business plan:

1. Better risk management for investors and other participants.
2. Stimulates new investment from current investors in this industry (add on financing for our films).
3. Creates industry buzz that could lead to increased box office.
4. The “price discovery” for each film will help guide our marketing and distribution plans (unique to each film).

The successful funding of our film development and production company will result in the creation of many hundreds of jobs across the country. Without the DBOR’s our task of raising the required capital in much harder.

Please let us know what we can do to help prevent the end to a great idea implemented by people and firms that understand the derivative markets and how to use them to the advantage of businesses AND the investing public.

Sincerely,



Tom Ashton  
CEO

Vantage Advisor Group, LLC