

**DECLARATION OF ADMINISTRATIVE FEASIBILITY  
AND REPRESENTATIONS MADE TO SWS SECURITIES, INC. DALLAS TX**

I, the General Partner (or Authorized Individual acting on behalf of the General Partner) of Rogers International Raw Materials Fund, LP ("LP") hereby make the following declarations (*each item must be initialed*):

ADG Retirement plan investors' interests in the LP will be registered to the retirement plan and will be reported under the Trustee's/Custodian's EIN;

ADG Retirement plan investors' interests in the LP will be reregistered to retirement plan investors' successor Trustees/Custodians, or to the retirement plan investor individually upon request;

ADG Retirement plan investors' liability is limited to the cash investment in the LP;

ADG Retirement plan investors' will not be allowed to invest in the LP under an installment payment program and investments will be fully paid for at the time the investor subscribes;

ADG Retirement plan investors' are exempt from any and all mandatory capital calls, subsequent contributions or assessments that may result in the LP or the Limited Partners pursuing a remedy, other than dilution against the retirement plan;

ADG Retirement plan investors' will receive only cash distributions and will not receive distributions of the assets or securities of the LP (i.e., distributions in-kind);

ADG Retirement plan investors' will be provided with all information and documentation regarding their investment including, but not limited to, any offering materials, Limited Partnership Agreement, etc.;

ADG The General Partner will provide the Trustee/Custodian of the retirement plan with UBTI information and updated dollar value per share/unit or investor/capital account balance at least annually.

The LP's address: Beeland Management Co., LLC  
% Uhlmann Price Securities, LLC  
141 West Jackson Blvd Ste 1340A  
Chicago IL 60604

ADG The LP's current dollar value per/unit is (if not a capital account) \$167.92 AS OF JAN 31, 2005

ADG The General Partner will directly notify retirement plan investors AND Trustee/Custodian of the retirement plan of any change in the status of the LP including, but not limited to, dissolution, bankruptcy, name change, address change, etc.

ADG The General Partner will send all Schedule K-1s (IRS Form 1065) and other informational materials directly to the Trustee/Custodian.

[Signature]  
General Partner or Authorized Individual

2/18/05  
Date

MANAGED MEMBER  
Title

State of: Illinois )  
County of: Cook ) ss.

The foregoing instrument was acknowledged before me this 18TH day of February, 2005  
By

Witness my hand and official seal,

My commission expires: 9/24/05

[Signature]  
Notary Public

