NFA

General Information

Preparer Information

In the event that clarification is required, please fill in the information for the contact person for this questionnaire.

Primary Contact

First Name	1000
Last Name	1001
Title	1002
Email Address	1003
Phone Number	1004

1005

☑ Add Secondary Contact

Secondary Contact

First Name	1006
Last Name	1007
Title	1008
Email Address	1009
Phone Number	1010

Information included is current as of :

4000

Commodity Interest Activity

Does the firm currently have customers and/or pools that engage in activity relating to commodity interests? Firms that should answer Yes to this question include, but are not limited to, firms that operate pools which invest in other pools that engage in commodity interests. Commodity interests includes futures/options on futures, retail off- exchange foreign currency (Forex), and swaps. Firms that refer business, recommend third party advisors or pool operators, offer tailored advice, broker or trade client accounts, or execute trades for clients should also consider these their customers *See the help text for more information.*

4001
◉ Yes ○ No

See CFTC Regulation §1.3 and Commodity Exchange Act §1a(9) for the definition of commodity interest.

Close help

Futures/Options on Futures?

4002
◉ Yes ○ No

See NFA Bylaw 1507 for the definition of futures.

Close help

Approximately how many customers and/or pools engaged in these transactions in the past 12 months?

4003

Retail off-exchange foreign currency (Forex)?

0258
◉ Yes ○ No

See CFTC Regulation §5.1 and Commodity Exchange Act §2(c)(2)(b) or §2(c)(2)(c) for the definition of forex.

Close help

Approximately how many customers and/or pools engaged in these transactions in the past 12 months?

4004

Swaps?

4006
◉ Yes ○ No

See CFTC Regulation §1.3 and Commodity Exchange Act §1a(47) for the definition of a swap.

Close help

Approximately how many customers and/or pools engaged in these transactions in the past 12 months?

4007

Were the swaps:

Cleared?

4008
◉ Yes ○ No

Cleared Swap means any swap that is, directly or indirectly, submitted to and cleared by a derivatives clearing organization registered with the CFTC or by a clearing organization that the CFTC has exempted from registration.

Close help

?   Uncleared?

4009
⦿ Yes ○ No

Uncleared Swap means a swap that is not cleared by a registered derivatives clearing organization, or by a clearing organization that the CFTC has exempted from registration.

Close help

Did the firm act as counterparty to transactions for the following types of swaps?

Cleared?

4010
⦿ Yes ○ No

Uncleared?

4011
⦿ Yes ○ No

List the number of exempt and non-exempt commodity pools the firm operates that have received funds.
Do not include a commodity pool if:

• *The firm solely directs assets of the pool as the trading manager/adviser.*
• *The pool has ceased trading or ceased trading commodity interests.*

0260
[   ]

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Solicitation/Promotional Material

(?) Does the firm currently solicit customers to trade commodity interests? Firms that refer business, recommend third-party advisors or pool operators, broker client accounts, or execute trades for clients should consider these their 'customers'.

0261
● Yes ○ No

> For purposes of this question, 'soliciting' means any direct or indirect form of communication with a member of the public that relates in any way to obtaining or retaining an account or agreement relating to or transacting in futures, forex and/or swaps transactions.
>
> Close help

How does the firm solicit for customers? Check all that apply:

4013A
☐ Cold Calls

4013B
☐ Commercial/TV Ad

4013C
☐ Electronic marketing materials

    4013D
    ☐ Email (includes distributions and email blasts)

    4013E
    ☐ Social Media

    4013F
    ☐ Website

    4013G
    ☐ Other

4013H
☐ Lead Lists (A lead list is a list of prospective customers purchased/received from a third-party.)

4013I
☐ Printed marketing material

4013J
☐ Radio Ad

4013K
☐ Referrals/Word of Mouth

4013L
☐ Social affiliations (i.e., charitable organizations, community involvement, etc.)

Does the firm have a website(s) related to its commodity interest business?

0195
● Yes ○ No

List the firm's website(s).

Does the firm utilize social media websites (e.g., Facebook, LinkedIn, Twitter) for its commodity interest business?

9749

⦿ Yes ◯ No

Which of the following is used?

4014A
☐ Facebook
4014B
☐ Instagram
4014C
☐ LinkedIn
4014D
☐ Twitter
4014E
☐ YouTube
4014F
☐ Other

◀ Previous   Save   💾   Next   ▶

Direct Electronic Access / Algorithmic Trading

Does the firm have electronic access to a Designated Contract Market (DCM)?

4033
◉ Yes ○ No

For purposes of this question, "Direct Electronic Access" means an arrangement where orders or order modifications are electronically routed directly to the Designated Contract Market (DCM) without the intervention of any intermediary, including the intermediary responsible for clearing any resulting trades.

Designated contract markets
(DCMs) are boards of trade (or exchanges) that operate under the regulatory oversight of the CFTC, pursuant to Section 5 of the Commodity Exchange Act (CEA), 7 USC 7. DCMs are most like traditional futures exchanges, which may allow access to their facilities by all types of traders, including retail customers.

DCMs may list for trading futures or option contracts based on any underlying commodity, index or instrument. Part 38 of the CFTC's regulations, 17 CFR Part 38, details the procedures and requirements for operating as a board of trade (or exchange).
See CFTC Reg 1.3 for additional details.

 Is the firm able to access a DCM without passing through an FCM's risk controls?

4034
◉ Yes ○ No

Do any of the firm's customers have direct electronic access to a DCM?

4035
○ Yes ○ No

Direct electronic access is when a customer of an FCM is allowed to enter orders directly into a DCM matching system for execution. Therefore, for purposes of this question, an FCM should indicate "yes" for customers whose accounts it carries and/or clears (not execution only) who are granted direct electronic access. An IB should indicate "Yes" if it is directly aware that a customer that it introduces to an FCM has been granted direct electronic access.

Close help

Does the firm utilize algorithms (not including automated order routing systems nor algorithms used to solely create trading ideas or allocations), with no human intervention, to initiate, modify, or cancel orders for proprietary trading (including for an affiliate) or trading on behalf of any managed accounts or pools, for futures/options on futures trading?

4038
◉ Yes ○ No

Do any of the firm's customers utilize algorithms (not including automated order routing systems nor algorithms used to solely create trading ideas or allocations), with no human intervention, to initiate, modify, or cancel orders, for futures/options on futures trading?

4039
◉ Yes ○ No

Approximately how many customers?

4040

Does the firm have direct electronic access to a Swap Execution Facility (SEF)? *See CFTC Regulation §37.3 for a definition of swap execution facility.*

4041
◉ Yes ○ No

Is the firm able to access a SEF without passing through an FCM's risk controls?

4042
◉ Yes ○ No

Do any of the firm's customers have direct electronic access to a SEF?

4043
○ Yes ○ No

Direct electronic access is when a customer of an FCM is allowed to enter orders directly into a SEF matching system for execution. Therefore, for purposes of this question, an FCM should indicate "yes" for customers whose accounts it carries and/or clears (not execution only) who are granted direct electronic access. An IB should indicate "Yes" if it is directly aware that a customer that it introduces to an FCM has been granted direct electronic access.

Close help

Does the firm utilize algorithms (not including automated order routing systems nor algorithms used to solely create trading ideas or allocations), with no human intervention, to initiate, modify, or cancel orders for proprietary trading (including for an affiliate) or trading on behalf of any managed accounts or pools, for swaps trading?

4046
◉ Yes ○ No

Do any of the firm's customers utilize algorithms (not including automated order routing systems nor algorithms used to solely create trading ideas or allocations), with no human intervention, to initiate, modify, or cancel for swaps trading?

4047

◉ Yes ○ No

Approximately how many customers?

4048

[ ]

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Other Regulator Information

Is the firm currently registered with or regulated by any other regulators?

`0900`
◉ Yes ○ No

The Board of Governors of the Federal Reserve

`0905`
○ Yes ○ No

The Federal Deposit Insurance Corporation (FDIC)

`0910`
○ Yes ○ No

The Office of the Comptroller of the Currency (OCC)

`0915`
○ Yes ○ No

The Farm Credit Association

`0192`
○ Yes ○ No

The Federal Housing Finance Agency

`0193`
○ Yes ○ No

The Securities and Exchange Commission (SEC)

`0194`
○ Yes ○ No

The Financial Industry Regulatory Authority (FINRA)

`0920`
○ Yes ○ No

Is the firm an Investment Adviser registered with the Securities Exchange Commissions and/or applicable state securities regulatory agency?

`0196`
◉ Yes ○ No

Select SEC and/or State

- SEC ?

`4015`
◉ Yes ○ No

Enter IARD

`4016`
[   ]

- State ?

`4017`
◉ Yes ○ No

Select State

Add ✚	State

Is the firm a SEC registered Broker/Dealer? This includes firms registered as broker-dealers under Section 15(b)(1) of the Securities Exchange Act of 1934. This does not include registration as a notice registered broker-dealer under Section 15(b)(11) of the Securities Exchange Act of 1934.

`0198`
◉ Yes ○ No

- Enter CRD#:

`4020`
[   ]

Non U.S. Regulator Information

Is the firm currently registered with or regulated by a non U.S. financial
services or prudential regulator?

4021
◉ Yes ○ No

If yes, please list:

4022

◀ Previous   Save   🖫   Next   ▶

DCM/DCO/SEF Trading Privileges/Memberships

Does the firm have trading privileges (member of) on any registered
Swaps Execution Facility (SEF)?

`0617`

◉ Yes ○ No

Identify the SEFs:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Does the firm have trading privileges (e.g., member of) on any
Designated Contract Market (DCM)?

`0618`

◉ Yes ○ No

Designated contract markets (DCMs) are boards of trade (or exchanges) that operate under the regulatory oversight of the CFTC, pursuant to Section 5 of the Commodity Exchange Act (CEA), 7 USC 7. DCMs are most like traditional futures exchanges, which may allow access to their facilities by all types of traders, including retail customers.

DCMs may list for trading futures or option contracts based on any underlying commodity, index or instrument. Part 38 of the CFTC's regulations, 17 CFR Part 38, details the procedures and requirements for operating as a board of trade (or exchange).

See CFTC Reg 1.3 for additional details.

Identify the DCMs:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Is the firm a member of any Derivatives Clearing Organization (DCO)?

`0619`

◉ Yes ○ No

A derivatives clearing organization (DCO) is an entity that enables each party to an agreement, contract, or transaction to substitute, through novation or otherwise, the credit of the DCO for the credit of the parties; arranges or provides, on a multilateral basis, for the settlement or netting of obligations; or otherwise provides clearing services or arrangements that mutualize or transfer credit risk among participants.
A DCO that seeks to provide clearing services with respect to futures contracts, options on futures contracts, or swaps must register with the CFTC before it can begin providing such services. The Commission may exempt a DCO from registration for the clearing of swaps if the Commission determines that such DCO is subject to comparable, comprehensive supervision by appropriate government authorities in the DCO's home country.

See CFTC Reg 1.3 for additional details.

Identify the DCOs:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Virtual Currency Products

Does the firm currently operate a pool (exempt or non-exempt) that executed a transaction or had an open position in **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

9810
◉ Yes ○ No

❓

4100
◉ Yes ○ No

Is the pool(s) listed with NFA?

Listed pools can be viewed by clicking "Pool List" in the sidebar menu.

Close help

Does the firm currently operate a pool (exempt or non-exempt) that invests in another pool that trades in or has the ability to invest in **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

4101
◉ Yes ○ No

❓

4102
◉ Yes ○ No

Is the pool(s) listed with NFA?

Listed pools can be viewed by clicking "Pool List" in the sidebar menu.

Close help

Does the firm currently **operate a pool** (exempt or non-exempt) that executed a transaction or had an open position in a **virtual currency derivative** (e.g., bitcoin future, option or swap) within the last 12 months?

9811
◉ Yes ○ No

❓

4103
◉ Yes ○ No

Is the pool(s) listed with NFA?

Listed pools can be viewed by clicking "Pool List" in the sidebar menu.

Close help

Does the firm currently operate any pool (exempt or non-exempt) that invests in another pool that trades in or has the ability to invest in **virtual currency derivatives** (e.g., bitcoin futures, options, or swaps)?

4104
◉ Yes ○ No

❓

4105
◉ Yes ○ No

Is the pool(s) listed with NFA?

Listed pools can be viewed by clicking "Pool List" in the sidebar menu.

Close help

Did the firm manage an account—other than an exempt or non-exempt pool the firm operates—that executed a transaction or had an open position in a **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

9809
◉ Yes ○ No

❓

4106

Enter the approximate number of **customer** accounts (including pools) managed by the firm and/or its employees that currently transact in or hold **spot/physical virtual currency** positions:

Do not include pool accounts (exempt or non-exempt) that the firm operates as a registered CPO as this information will be reported at the pool level.

Close help

Enter the approximate percentage of the customers' assets under management (AUM) that make up investments in **spot/physical virtual currency** products:

`4107`

Identify the types of **spot/physical virtual currency** products in which your customers transact (select all that apply):

`4108A`
☐ Bitcoin

`4108B`
☐ Ethereum

`4108C`
☐ Other

Did the firm **manage** an account—other than an exempt or non-exempt pool the firm operates—that executed a transaction or had an open position in a **virtual currency derivative** (e.g., bitcoin futures, option or swap) within the last 12 months?

`9807`
◉ Yes ○ No

?

Enter the approximate number of customer accounts (including pools) managed by the firm and/or its employees that currently trade or hold open positions in **virtual currency derivatives:**

`4109`

Do not include pool accounts that the firm operates as a registered CPO.

Close help

Enter the approximate percentage of the customers' assets under management (AUM) that make up investments in **virtual currency derivatives**:

`4110`

Identify the types of **virtual currency derivative** products that your customers transact in (select all that apply):

`4111A`
☐ Bitcoin Futures

`4111B`
☐ Bitcoin Options

`4111C`
☐ Ether Futures

`4111D`
☐ Micro Bitcoin Futures

`4111E`
☐ Other

Did the firm solicit or accept an order in a **spot/physical virtual currency (e.g., bitcoin, ethereum)** within the last 12 months?

`4028`
◉ Yes ○ No

Enter the approximate number of customers for which your firm currently has accepted orders involving **spot/physical virtual currency:**

`4112`

Enter the number of **spot/physical virtual currency long** positions currently held by customers:

`4113`

Enter the number of **spot/physical virtual currency short** positions currently held by customers:

`4114`

Identify the **spot/physical virtual currency** products that customers currently transact in: (Select all that apply)

`4115A`
☐ Bitcoin

`4115B`
☐ Ethereum

`4115C`
☐ Other

Does the firm have proprietary account(s), as defined in CFTC Regulation 1.3, that engages in **spot/physical virtual currency** transactions?

4116
◉ Yes ○ No

Enter the number of **spot/physical virtual currency long** positions currently held for proprietary purposes (as defined in CFTC Regulation 1.3):

4117
[   ]

Enter the number of **spot/physical virtual currency short** positions currently held for proprietary purposes (as defined in CFTC Regulation 1.3):

4118
[   ]

Identify the **spot/physical virtual currency** products that are currently held by the firm for proprietary purposes (as defined in CFTC Regulation 1.3): (Select all that apply)

4119A
☐ Bitcoin

4119B
☐ Ethereum

4119C
☐ Other
[   ]

Did the firm solicit or accept an order in **virtual currency derivatives (e.g., bitcoin futures, options or swaps)** within the last 12 months?

9808
◉ Yes ○ No

? Enter the approximate number of customer accounts that currently have open positions involving a **virtual currency derivative**.

4120
[   ]

Do not include pool accounts (exempt or non-exempt) that the firm operates as a registered CPO as this information will be reported at the pool level.

Close help

Enter the number of open **virtual currency derivative long** positions currently held by customers:

4121
[   ]

Enter the number of open **virtual currency derivative short** positions currently held by customers:

4122
[   ]

Identify the types of **virtual currency derivative** products traded: (Select all that apply)

4123A
☐ Bitcoin Futures

4123B
☐ Bitcoin Options

4123C
☐ Ether Futures

4123D
☐ Micro Bitcoin Futures

4123E
☐ Other
[   ]

Does the firm have a proprietary account(s), as defined in CFTC Regulation 1.3, that currently engages in **virtual currency derivative** transactions?

4124
◉ Yes ○ No

Enter the number of open **virtual currency derivative long positions** currently held for proprietary purposes:

4125
[   ]

Enter the number of open **virtual currency derivative short positions** currently held for proprietary purposes:

4126
[   ]

Identify the types of **virtual currency derivative** products traded for proprietary purposes: (Select all that apply)

4127A
☐ Bitcoin Futures

4127B
☐ Bitcoin Options

4127C
☐ Ether Futures

4127D
☐ Micro Bitcoin Futures

4127E
☐ Other

Did the firm act as a counterparty to **virtual currency OTC products** (including swaps and NDFs) within the past 12 months?

4029
● Yes ○ No

Does the firm participate in transactions which involve lending or borrowing in **spot/physical virtual currency**?

4128
● Yes ○ No

Micro Contract Products

❓ Does the firm currently have customers that engage in transactions in Micro contracts?

2001
◉ Yes ○ No

Micro contracts represent an even smaller fraction of value of the normal futures and corresponding e-mini, if applicable.

Close help

2002
Enter the approximate number of customer accounts that trade in Micro contracts:
[   ]

Is the minimum account funding level for customers trading Micro contracts lower than the minimum required funding for trading in other standard products?

2003
◉ Yes ○ No

Indicate the minimum account funding level for customers trading in Micro contracts:

2004
[   ]

Are the round-turn commissions charged to customers trading in Micro contracts lower than those trading in other standard products?

2005
◉ Yes ○ No

Indicate average round-turn commission charged to customers trading in Micro contracts:

2006
[   ]

2007
Enter the number of open Micro contract long positions currently held by customers:
[   ]

2008
Enter the number of open Micro contract short positions currently held by customers:
[   ]

Identify the types of Micro contracts that your customers transact in: (check all that apply)

2009A
☐ Equity

2009B
☐ Fixed Income

2009C
☐ Metals

2009D
☐ Energy

2009E
☐ FX Futures

2009F
☐ Other: [   ]

2016
❓ Does the firm currently operate a pool(s) that engages in transactions in Micro contracts?
◉ Yes ○ No

Micro contracts represent an even smaller fraction of value of the normal futures and corresponding e-mini, if applicable.

Close help

2017
❓ Is the pool(s) listed with NFA?
◉ Yes ○ No

Listed pools can be viewed by clicking "Pool List" in the sidebar menu.

Close help

Enter the types of Micro contracts traded by the pool(s):

2018A
☐ Equity

2018B
☐ Fixed Income

2018C
☐ Metals

2018D
☐ Energy

2018E
☐ FX Futures

2018F
☐ Other: _____

Does the firm currently trade in Micro contracts for proprietary purposes?

2037
◉ Yes ○ No

Micro contracts represent an even smaller fraction of value of the normal futures and corresponding e-mini, if applicable. Proprietary account is defined in CFTC Regulation 1.3.

Close help

Enter the number of open long proprietary positions in Micro contracts:

2038
_____

Enter the number of open short proprietary positions in Micro contracts:

2039
_____

Identify the types of Micro contracts traded for proprietary purposes:

2040A
☐ Equity

2040B
☐ Fixed Income

2040C
☐ Metals

2040D
☐ Energy

2040E
☐ FX Futures

2040F
☐ Other: _____

Miscellaneous

Is the firm a publicly traded company?

4030
◉ Yes ○ No

Provide the equity ticker symbol:

4031

Have the supervisory personnel at the firm reviewed NFA's self-examination questionnaire and signed the accompanying attestation within the last 12 months?*See the help text for firm requirements.*

0251
◉ Yes ○ No

On an annual basis, appropriate supervisory personnel must review the Member's supervisory procedures utilizing the **current** NFA Self-Examination Checklist. Based upon this review, appropriate supervisory personal must sign an attestation stating that the Member's operations have been evaluated based on the checklist and attesting that the Member's procedures comply with all applicable NFA requirements.

Close help

Does the firm have a Risk Management Department?

9800
◉ Yes ○ No

Does the firm have a designated Chief Compliance Officer?

4032
◉ Yes ○ No

Does the firm utilize any cloud service providers for any cloud-based platform, infrastructure, application, or storage services for any of its commodity interest information?

4050
◉ Yes ○ No

Provide Name of Service Provider:

Ensure that all active relationships are listed above as of the filing date. If you need to add, edit, or delete a relationship please click here.

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Disaster Recovery

For purposes of business continuity and disaster recovery, Members are required to provide NFA with the name and contact information for one or two persons who NFA can contact during an emergency. Since this information will serve as an alternative contact in the event you are unable to continue doing business at your main location, the contact information that you provide should be different from that of your main location.

Primary Contact Information

First Name

0166

Last Name

0165

Street Address

0168

Street Address 2

0169

Street Address 3

0170

City

0171

State

0172

--Select State--

Province

0173

Country

0174

--Select Country--

Zip Code

0175

Primary Phone Number

0176

Secondary Phone Number

0177

Email Address

0164

Secondary Contact Information

First Name

0180

Last Name

0179

Street Address

0182

Street Address 2   0183

Street Address 3   0184

City   0185

State   0186
--Select State--

Province   0187

Country   0188
--Select Country--

Zip Code   0189

Primary Phone Number   0190

Secondary Phone Number   0191

Email Address   0178

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NFA

Not Doing Business

Based on the firm's responses, the firm does not appear to be doing commodity interest business. Explain the firm's current business operations and/or future intentions as an NFA member/CFTC registrant and why the firm maintains NFA membership and CFTC Registration.

4012