

Dear Sir/Madam,

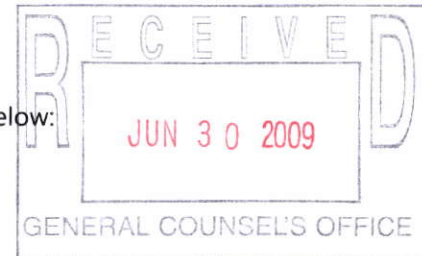
I am in receipt of the National Futures Association before the Business Conduct Committee complaint made against ACM USA (NFA ID #388715) and myself Ed Anderson (NFA ID #394977) - former CEO ACM USA.

NFA Case No. 09-BCC-011

Per the complaint I am here by providing you with my answers to the two counts below:

Count I

Failing to file required financial reports in a timely manner.



The process I had in place, from ACM USA's inception as an FDM, required that all filings were made within the prescribed and allotted timeframe as required. ACM USA's financial consultant, Mr. Marc Goetz, with my supervision and approval, had the responsibility to file complete and accurate reports to our regulatory body.

However, it should be noted that there were some severely mitigating circumstances regarding the filings of the 1-FR:

October 2008 – We incorrectly assumed that Veterans Day was observed as a holiday (actual observance was November 11th) and therefore not a business day. Hence 1 day delay in filing.

November 2008 – I was awaiting my PIN as the new CEO. We had tried repeatedly to get access to the electronic filing medium but to no avail. Once I was given my PIN we filed accordingly. Hence 1 day delay in filing.

December 2008, January 2009, February 2009 and March 2009 – ACM was directed by its owner to cease operations as an FDM in December of 2008. We then began the huge, and onerous, task of refunding all of ACM USA's client's funds. We used numerous methods to expedite this process utilizing a large number of internal resources. Following our notification of our change in business to the NFA we were requested to provide weekly updates as to the status of all refunds. With so many refunds it became extremely difficult to accurately calculate the Net Capital figure. I expressly told Mr. M. Goetz that I preferred accuracy over timeliness as ACM USA strived to return these funds. Hence we inadvertently delayed filing the 1-FR by 5 days for January, 2 days for February and 1 day for March.

April 2009 – The certified audit was submitted 15 days late due to factors that were beyond the control of ACM USA. Mr. Goetz was working closely with Ernst & Young to prepare and provide accurate information for our first year financial audit. I was informed by Mr. Goetz and E&Y that first year filings are intensive and, with our change in business model – closure of the FDM, this would result in a larger amount of information/records/data etc needed than normal. We also had to allocate scarce resources to assist with

an NFA audit of our February 1-FR. Please be advised that I was forced to reduce ACM USA's headcount by 50% in Q1 2009 due to our change in status.

All of these factors contributed to the tardiness of the filing. Again, I stress that I was specific in my orders that all filings needed to be accurate so as to allay any future "issues" that may have arisen due to inaccurate data.

Count II

Failing to supervise ACM's operations.

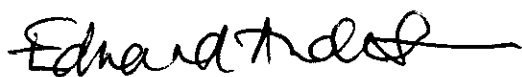
As CEO of ACM USA I put in place the process whereby all filings to the NFA (1-FR's etc) would be handled by the respective and responsible professionals. For such filings they were to be filed by Marc Goetz, financial consultant and a CPA with over 15 years of experience, with my supervision of their preparation and submission.

I had directed Mr. Goetz that all filings were to be accurate and not filed prematurely. I wanted to ensure that our regulatory body had complete and accurate information.

It was never my intention, nor the intention of ACM USA, to disregard regulatory deadlines – it was merely an unfortunate chain of events that lead to such tardiness on our part. The Company, and I, took full responsibility for these infractions and paid all fines/penalties associated with them.

Whilst I am no longer CEO of ACM USA (I was terminated in May 2009) I remain at your disposal to provide additional information if required.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Edward Anderson", with a long horizontal flourish extending to the right.

Edward Anderson