

PROGRAM REPORT FOR COMMODITY TRADING ADVISORS

Name: FIRM NAME

Ending Date: 3/31/2020

NFA ID: 0000000

INFORMATION ABOUT THE CTA

1. CTA INFORMATION

Commodity Trading Advisor: The term "commodity trading advisor" or "CTA" has the same meaning as "commodity trading adviser" as defined in section 1a(12) of the Commodity Exchange Act.

Provide the following general information concerning the CTA:

- a. CTA's Name: _____ 0010
- b. CTA's NFA ID#: _____ 0011
- c. Person to contact concerning this Form CTA-PR _____ 0012
- d. Total number of Trading Programs offered by the CTA: _____ 0013

The term "Trading Program" has the same meaning as "trading program" as defined in CFTC Rule 4.10(g), which indicates that "trading program" refers to the program pursuant to which a person (1) directs a client's commodity interest account, or (2) guides the client's commodity interest trading by means of a systematic program that recommends specific transactions. This figure should only include trading programs for which the CTA is registered or is required to be registered. However, you should exclude any programs that consist solely of accounts for which registration is not required.

- e. Total number of Trading Programs offered by the CTA under which the CTA Directs Pool assets: _____ 0014

The term "Direct" as used in the context of trading commodity interest accounts, has the same meaning as "direct" as defined in CFTC Rule 4.10(f). However, you should exclude any programs that consist solely of pools for which the CPO is not required to be registered

2. POOL ASSETS DIRECTED BY THE CTA

Provide the following information concerning the amount of assets Directed by the CTA:

- a. Total assets Directed by CTA: _____ 0015

This figure should reflect the total nominal value of all assets directed by the CTA in programs for which the CTA is registered, or is required to be registered. However, you should exclude any assets that are attributable to pools for which the CPO is not required to be registered. Further, you should exclude any pool assets attributed to commodity pools that you operate as a CPO and report on CPO Form PQR.

- b. Total pool assets Directed by CTA: _____ 0016

This figure can exclude any pool assets that are attributable to exempt or excluded pools. However, pool assets that are attributable to pools exempt under 4.7, 18-96 or 4.12 should be included. If the CTA is also registered as a CPO, it can exclude the assets of those pools that it operates.

- c. Name(s) of Pools advised by CTA:

This list should exclude any pools that are exempt or excluded pools. However, pools that are attributable to exemption under 4.7, 18-96 or 4.12 should be included.

Name(s) of Pools

_____ 0104

- d. Name of the reporting CPO for each Pool identified in 2.c.

If you identified several pools above, repeat this process until all CPOs are reflected in the box below.

Name of CPOs

_____ 0105

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KEY RELATIONSHIPS

3. Carrying Brokers: Please identify all registered FCMs, FDMs, and/or RFEDs that carry your client accounts or that you transact business with. This should include even those carrying brokers for accounts that are excluded in item 5 on the next page, unless the relationship has already been reported through a PQR filing.

Carrying Broker Name

NFA ID

_____ 0101 _____ 0100

4. Commodity Trading Advisors: Please identify all registered CTAs that you allocate funds. This should include CTAs for programs that are excluded in item 5 on the next page, unless the relationship has already been reported through a PQR filing. You do not need to include your own firm.

Commodity Trading Advisor Name

NFA ID

_____ 0221 _____ 0220

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TRADING PROGRAMS

5. Trading Programs

In #6 below, you are asked to identify by name certain of the trading programs you reported on Question 1.d. Specifically, for purposes of reporting, you can exclude any trading program in which 100% of the assets attributed to the trading program are covered by one or more of the following criteria:

(a) Programs that consist of assets that are attributed to pools listed with NFA (i.e., pools with a pool identification number in NFA's BASIC System), which includes both regulated and exempt pools that are operated by a registered CPO;

(b) Programs for which you allocate the assets to a sub-advisor(s);

(c) Programs that consist of managed accounts that trade parallel to pools listed with NFA;

(d) Programs that do not have the ability or do not intend to trade commodity interests;

(e) Programs that consist of one or more separate accounts, all of which are for the same beneficial owner (or affiliated beneficial owners) and the trading is customized for that accounts(s); and

(f) Programs that have not traded commodity interests in the past 12 months.

Click here if all of your trading programs can be excluded based on the criteria above.

0212

6. Managing Programs

For any program that you could not exclude in #5, you must report specific information on those programs. If this is your first filing or you have a new program, you will need to create each program in the EasyFile system, which is done on the Program Management screen. Please click here to visit the Program Management screen. Once you have created all of your programs, you are ready to complete the grid below. Click on "Add" to select each program and enter the Rates of Return and AUM. If the program didn't trade during a month, please indicate "NT" for that month.

Program ID	0206
Trading Program Name	0207
1st Month ROR	0208
2nd Month ROR	0209
3rd Month ROR	0210
AUM at End of Reporting Period	0211

To edit the Rates of Return or AUM figure for a particular program, please click on the Edit button next to the applicable program. If you added a program to the grid in error, please click the Red X button next to the applicable program.

7. For any programs that you were able to exclude from the above grid, please select all of the exclusions that apply to those programs.

Programs that consist of assets that are attributed to pools listed with NFA (i.e., pools with a pool identification number in NFA's BASIC System), which includes both regulated and exempt pools that are operated by a registered CPO;

0213

Programs for which you allocate the assets to a sub-advisor(s);

0214

Programs that consist of managed accounts that trade parallel to pools listed with NFA;

0215

Programs that do not have the ability or do not intend to trade commodity interests;

0216

Programs that consist of one or more separate accounts, all of which are for the same beneficial owner (or affiliated beneficial owners) and the trading is customized for that accounts(s); and

0217

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Programs that have not traded commodity interests in the past 12 months.

0218

8. Supplemental information relating to any funds under management allocated to futures and swaps:

Enter total nominal value of all assets directed by the CTA in programs that include but are not limited to futures and swaps. For purpose of this balance you should include all separately managed accounts including accounts for exempt or excluded commodity pools pursuant to 4.13 or 4.5. Futures is defined to include futures, options on futures, foreign futures and foreign options, off-exchange retail foreign currency, leverage transactions, and security futures products. Swaps under CFTC jurisdiction are defined in CEA 1(a)(47)(A) and CFTC Regulation 1.3(xxx). Exclude any pool assets attributed to commodity pools that you operate as a CPO and report on CPO Form PQR.

0030

Provide a breakdown (by approximate percentage) of the Total Assets Directed by the CTA (reported in box0030 above) that were allocated to the following investment categories as of the reporting date.

- When reporting the approximate percentage in each of the categories below, provide a reasonable good faith estimate based upon the data that is available to you.
- If you are also registered as a CPO, you should exclude any pool assets attributed to commodity pools that you operate as a CPO and report on CPO Form PQR.
- Where collateral/margin is required but has not been posted as of the reporting date, you should include the required collateral/margin in the appropriate investment category.
- Where notional funds have been designated to the CTA for futures and swaps trading, you should include those available funds in the excess collateral/cash allocated for futures and swaps trading category.
- All percentages should be rounded to the nearest percent and total percentages allocated among these categories of investments should add up to 100%. Enter "0" in any investment category for which the CTA has no assets allocated as of the reporting date.

Investment Category Approximate Percentage of Total Assets Directed By the CTA

• Futures (unrealized gain/loss plus required margin/collateral)
(Futures is defined to include futures, options on futures, foreign futures and foreign options, off-exchange retail foreign currency, leverage transactions, and security futures products).

0025

• Swaps (unrealized gain/loss plus required margin/collateral) (Swaps under the CFTC jurisdiction as defined in CEA 1(a)(47)(A) and CFTC Regulation 1.3(xxx)).

0026

• Excess collateral/cash allocated for futures and swap trading

0027

• Other Investments and Cash (not allocated to futures and swaps)

0028

Total

TTL

9. FINANCIAL RATIO REPORTING

Please provide information on your firm's financial operations by reporting two separate financial ratios. In computing these ratios, please note the following:

- The ratios must be calculated using generally accepted accounting principles or another internationally recognized accounting standard, consistently applied.
- The ratios must be calculated using the accrual method of accounting.
- For firms that are dually registered as a CPO and CTA, and file both the PQR and PR, the ratios will be carried over between the forms and can be amended on either filing
- Always use the absolute value of the respective balance. Ratios should not be reported as negative numbers. Further, firms should report a ratio of "0" if the denominator is 0.

a. Holding Company/Subsidiary Reporting

Firms that are part of a holding company/subsidiary structure may elect to report the two ratios at the Parent/Holding Company level or the Subsidiary Member Firm level.

Are you a subsidiary in a holding company structure?

A001

b. Reporting Period

A firm that has a fiscal year end that does not align with the reporting quarters may report the ratios as of the firm's most recently ended fiscal quarter.

Are the reported ratios for a period with the same end date as the end date of this PR filing (i.e. PR reporting date is 6/30/2017, Current Assets/Current Liabilities Ratio as of 6/30/2017)?

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A005

c. Current Assets/Current Liabilities (CA/CL) Ratio

This ratio is based on a firm's current asset and current liability balance at the reporting quarter end.

Current Assets/Current Liabilities (CA/CL) Ratio

A003

Current Assets: Cash or any asset that can be readily converted to cash within one year. Current assets for a CTA may include, but are not limited to, cash, marketable securities, short-term investments, and accounts receivable.

Current Liabilities: Obligations that are reasonably expected to be paid within one year. Current liabilities include, but are not limited to, accounts payable, accrued expenses, payroll liabilities, income tax liabilities, and interest payable. A firm's long-term financial obligations that are not due within the present accounting year are considered a noncurrent liability and should not be included in this ratio.

d. Total Revenue/Total Expenses (TR/TE) Ratio

This ratio must reflect the total revenue earned and total expenses incurred during the prior 12 months.

Total Revenue/Total Expenses (TR/TE) Ratio

A004

Total Revenue: Gross income earned by a firm from its normal business activities before any expenses have been deducted. Income may be received as cash or a cash equivalent and is typically generated by a CTA through management and/or incentive fees.

Total Expenses: Costs incurred in a firm's efforts to generate revenue, representing the cost of doing business. Expenses may include, but are not limited to, wages and salaries, rent, utilities, depreciation, and bad debts.

You have reached the end of this filing. If you are finished with the filing, please click 'Submit Filing' in the top menu.