

CTA Operations

9763

Does the firm currently direct any trading of commodity interest accounts?

Yes No

A firm should not answer "Yes" if it meets the following criteria: (1) A CTA that is registered, but does not direct, as that term is defined in § CFTC Regulation §4.10(f)*, the trading of any commodity interest accounts; (2) A CTA that is registered, but directs only the accounts of commodity pools for which it is registered as a commodity pool operator and; (3) A commodity trading advisor that is registered, but directs only the accounts of commodity pools for which it is exempt from registration as a commodity pool operator. See CFTC Regulation §4.27 for details.

Direct, as used in the context of trading commodity interest accounts, refers to agreements whereby a person is authorized to cause transactions to be effected for a client's commodity interest account without the client's specific authorization.

List the approximate number of customer accounts (including pools) managed by the firm and/or its employees that trade commodity interests. Do not include pool accounts that the firm operates as a registered CPO. 0059

Indicate the last date the firm entered into an agreement with a prospective customer to direct the customer's commodity interest account. 5056

5002

Does the firm advise Special Entities as defined in CFTC Regulation 23.401(c) in swaps transactions?

Yes No

Commission Regulation 23.401(c) defines the term "Special Entity" as: a Federal agency; a State, State agency, city, county, municipality, other political subdivision of a State, or any instrumentality, department, or a corporation of or established by a State or political subdivision of a State; any employee benefit plan subject to Title I of the Employee Retirement Income Security Act of 1974 ("ERISA"); any governmental plan, as defined in Section 3 of ERISA; any endorsement, including an endorsement that is an organization described in Section 501(c)(3) of the Internal Revenue Code of 1986; or any employee benefit plan defined in Section 3 of ERISA, not otherwise defined as a Special Entity, that elects to be a Special Entity by notifying a swap dealer or major swap participant of its election prior to entering into a swap with the particular swap dealer or major swap participant.

5003

Approximately how many Special Entities does the firm advise?

Does the firm provide commodity trading advice to the general public (such as in a newsletter, periodical, or telephone hotline)? 5000

Yes No

Does the firm recommend third-party trading advisors or pool operators or provide tailored advice without exercising discretionary authority? 5001

Yes No

Does the firm solicit for or accept accounts for non-Qualified Eligible Persons (QEPs)? See CFTC Regulation §4.7 for applicable definitions. 0216

Yes No

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Has the firm provided these non-QEP customers with a CTA Disclosure Document?

Yes No

0051

Enter the date of the firm's most recent CTA Disclosure Document provided to a prospective customer.

Check all fees charged or received by the firm during the last 12 months, as applicable:

5005

A percentage of assets under CTA's management

5006

Performance-based fees

5007

Subscription fees (for a newsletter, periodical, trading system)

5008

Fixed fees (other than subscription fees)

5009

Up-front fee

5010

Commission

5011

Other Indicate type of fee

5013

The firm did not charge or receive any fees during the last 12 months.

