



# 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	<div>1000</div> <input type="text"/>
Last Name	<div>1001</div> <input type="text"/>
Title	<div>1002</div> <input type="text"/>
Email Address	<div>1003</div> <input type="text"/>
Phone Number	<div>1004</div> <input type="text"/>

1005

☒ Add Secondary Contact

### Secondary Contact

First Name	<div>1006</div> <input type="text"/>
Last Name	<div>1007</div> <input type="text"/>
Title	<div>1008</div> <input type="text"/>
Email Address	<div>1009</div> <input type="text"/>
Phone Number	<div>1010</div> <input type="text"/>



## Commodity Interest Activity



Does the firm currently have customers and/or pools that engage in activity relating to commodity interests (futures/options on futures, retail off-exchange foreign currency (Forex), and swaps)?

4001

☒ Yes ☐ No

Examples of commodity interest activity include, but are not limited to:

- Refer business to or recommend third-party advisors or pool operators
- Offer tailored advice
- Introduce, broker, carry, or trade client accounts
- Execute trades for clients
- Operate pools which invest in other pools that engage in commodity interests

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 solicit customers to trade commodity interests (futures/options on futures, retail off-exchange foreign currency (Forex), and swaps)? 0261 ☒ Yes ☐ No

Examples include, but are not limited to:

- Soliciting to refer or recommend third-party advisors
- Soliciting for pools or pool operators
- Soliciting to introduce, broker, carry or trade client accounts

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


5001

☒ Yes ☐ No

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

0195

☒ Yes ☐ No

Add 	Website

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

## Direct Electronic Access / Algorithmic Trading

4033 Does the firm have electronic access to a Designated Contract Market (DCM)? ☒ 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.

4034 Is the firm able to access a DCM without passing through an FCM's risk controls? ☒ Yes ☐ No

4035 Do any of the firm's customers have direct electronic access to a DCM? ☐ 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

4038 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? ☒ Yes ☐ No

4039 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? ☒ Yes ☐ No

Approximately how many customers?

4040

4041 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. ☒ Yes ☐ No

4042 Is the firm able to access a SEF without passing through an FCM's risk controls? ☒ Yes ☐ No

4043 Do any of the firm's customers have direct electronic access to a SEF? ☐ 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

4046 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? ☒ 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

# Other Regulator Information

Is the firm currently registered with or regulated by any other regulators? 0900  
☒ Yes ☐ No

Note: for Swap Dealer Members, U.S. Prudential Regulator as defined in section 1a(39) of the Commodity Exchange Act, include the Board of Governors of the Federal Reserve System Currency, the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the Farm Credit Association, and the Federal Housing Finance Agency.

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 Administration 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 registered with or regulated by a non-US financial services or prudential regulator?

4021

☒ Yes ☐ No

If yes, please list:

4022

# DCM/DCO/SEF Trading Privileges/Memberships

Does the firm have a Legal Entity Identifier (LEI)?

7113

☒ Yes ☐ No

A Legal Entity Identifier (LEI) is a 20-character, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization (ISO).

Enter the Legal Entity Identifier (LEI)?

0465

The Legal Entity Identifier (LEI) is a unique global identifier of legal entities participating in financial transactions. These can be individuals, companies or government entities that participate in financial transaction. The identifier is used in reporting to financial regulators and all financial companies and funds are required to have an LEI.

The identifier is formatted as a 20-character, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization (ISO). It connects to key reference information that enables clear and unique identification of legal entities participating in financial transactions. Each LEI contains information about an entity's ownership structure and thus answers the questions of 'who is who' and 'who owns whom'. Simply put, the publicly available LEI data pool can be regarded as a global directory of participants in the financial market.

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

0617

☒ Yes ☐ No

Identify the SEFs:

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:

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:



# Security Futures Products



Does the firm currently solicit or have any customer accounts that trade security futures products? *Security futures products are defined as single stock futures and narrow-based securities indices. See the help text for more information.*

4027

☒ Yes ☐ No

See [Commodity Exchange Act §1a\(45\)](#) for the definition of securities futures product (SFP). SFP does not include broad-based indices such as the S 500 or Dow. See NFA's website for more information on [SFPs](#) .

Close help

Approximately how many customers trade security futures products?

9748

# Digital Asset Products – CPO

## Digital Assets Derivatives

Does the firm operate a pool (exempt or non-exempt) that **directly** invested in **digital asset derivatives** (e.g., bitcoin/ether futures, options, or swaps, including perpetual futures or swaps) within the last 12 months?

9811

☒ Yes ☐ No



Are any of the pool(s) listed with NFA?

4103

☒ Yes ☐ No

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

Close help

Add	Pool ID and Name

Does the firm operate a pool (exempt or non-exempt) that invested in another fund that invested in **digital asset derivatives** (e.g., bitcoin/ether futures, options, or swaps, including perpetual futures or swaps) within the last 12 months?

4104

☒ Yes ☐ No



Are the pool(s) that are operated by the firm listed with NFA?

4105

☒ Yes ☐ No

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

Close help

Add	Pool ID and Name

## Spot Digital Asset Products

Does the firm operate a pool (exempt or non-exempt) that **directly** invested in or held **spot digital assets** (e.g., bitcoin, ether) within the last 12 months?

9810

☒ Yes ☐ No



Are any of the pool(s) listed with NFA?

4100

☒ Yes ☐ No


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

Close help

Add	Pool ID and Name

4100B

☒ Yes ☐ NoAre any of the pool(s) **not** listed with NFA?

Add 	Pool Name

4101

☒ Yes ☐ NoDoes the firm operate a pool (exempt or non-exempt) that invested in another fund that invested in or held **spot digital assets** (e.g., bitcoin, ether) within the last 12 months?

4102

☒ Yes ☐ No

Are any of the pool(s) that are operated by the firm listed with NFA?

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

Close help

Add 	Pool ID and Name

4102B

☒ Yes ☐ NoAre any of the pool(s) that are operated by the firm **not** listed with NFA?

Add 	Pool Name

4128

☒ Yes ☐ NoDoes the firm operate any pools that engage in other **spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) within the last 12 months?

Identify the type of activity (Respond to all):

9813A

☐ Lending

9813B

☐ Borrowing

9813C

☐ Staking

9813D

☒ Other

9813E

Briefly explain the other type of spot digital activities the pool(s) engage in.


**Firm Proprietary Activities**

4116

☒ Yes ☐ NoDoes the firm have proprietary account(s), as defined in CFTC Regulation 1.3, that currently invest in or hold **spot digital assets** (e.g., bitcoin, ether)?

Identify the exchange(s)/custodian(s)/broker(s)/platform(s) where **spot digital assets** are currently invested in or held for proprietary accounts:

If the firm self-custodies digital assets/uses a non-custodial wallet, add "Self-Custody" to the list.

Add 	Name	Location

Identify the types of **spot digital assets** the firm's proprietary accounts invest in or hold (Respond to all):

- 4119A
- ☐ Bitcoin
- 4119B
- ☐ Ether
- 4119E
- ☐ Stablecoin
- 4119C
- ☒ Other

Indicate what other type of **spot digital assets** the firm invests in or holds for its proprietary accounts.

4119D

Does the firm currently participate in any **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) for its proprietary accounts?

- 4164
- ☒ Yes ☐ No

Identify the type of activity (Respond to all):

- 4165A
- ☐ Lending
- 4165B
- ☐ Borrowing
- 4165C
- ☐ Staking
- 4165D
- ☒ Other


Briefly explain the other type of **spot digital asset activities** the firm participates in for its proprietary accounts.

4165E

# Digital Asset Products – CTA


## Digital Assets Derivatives

Did the firm manage an account (other than exempt or non-exempt pools the firm operates) that executed a transaction in **digital asset derivatives** (e.g., bitcoin/ether futures, option, or swaps, including perpetual futures or swaps) within the last 12 months? 9807 ☒ Yes ☐ No

 Enter the approximate number of managed accounts (include any pool account(s) operated by third-party operators) that have open positions in **digital asset derivatives** (e.g., bitcoin/ether futures, options, or swaps, including perpetual futures or swaps): 4109

Pool accounts operated by the firm as a CPO or exempt CPO should not be included.

Close help

 Enter the approximate percentage of the firm's total Assets Under Management (AUM) invested in **digital asset derivatives** (e.g., bitcoin/ether futures, options, or swaps, including perpetual futures or swaps): 4110

If percentage is greater than 0 but less than 1%, round up to the next percentage.

Close help

Identify the exchange(s) where **digital asset derivatives** trading is **currently** conducted on behalf of managed accounts:

Click to Add/Edit/Delete Exchange(s) below:


Exchange Name	Location
No Data	

Identify the types of **digital asset derivatives** the firm is **currently** trading on behalf of its managed accounts (Respond to all):

- 4111A  
☐ Bitcoin Futures
- 4111B  
☐ Bitcoin Options
- 4111C  
☐ Ether Futures
- 4111G  
☐ Ether Options
- 4111D  
☐ Micro Bitcoin Futures
- 4111J  
☐ Perpetual futures/swaps
- 4111E  
☐ Other

## Spot Digital Asset Products

Did the firm manage an account (other than an exempt or non-exempt pools the firm operates) that has invested in or held **spot digital assets** (e.g., bitcoin, ether) within the last 12 months? 9809 ☒ Yes ☐ No

 Enter the approximate number of managed accounts (include any pool account(s) operated by third-party operators) that **currently** invest in or hold **spot digital assets** (e.g., bitcoin and ether): 4106

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

Close help



Enter the approximate percentage of the firm's total Assets Under Management (AUM) invested or held in **spot digital assets** (e.g., bitcoin, ether):

4107

If percentage is greater than 0 but less than 1%, round up to the next percentage.

Close help

Identify the exchange(s)/custodian(s)/broker(s)/platform(s) where **spot digital assets** are **currently** invested or held for managed accounts:

**Name of Exchange/Custodian/Platform:**

Add	Name	Location

Identify the types of **spot digital assets** the firm's managed accounts **currently** invest in or hold (Respond to all):

4108A

☐ Bitcoin

4108B

☐ Ethereum

4108E

☐ Stablecoin

4108C

☒ Other

Indicate what other type of **spot digital asset**.

4108G

Has the firm engaged in any **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) on behalf of managed accounts within the last 12 months?

5301

☒ Yes ☐ No

Identify the types of **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) the firm **currently** engages in on behalf of managed accounts: (Respond to all)

5301A

☐ Lending

5301B

☐ Borrowing

5301C

☐ Staking

5301D

☒ Other



Briefly explain the other type of **spot digital asset** activities.

5301E

Firm Proprietary Activities


Does the firm have proprietary account(s), as defined in CFTC Regulation 1.3, that currently invest in or hold **spot digital assets** (e.g., bitcoin, ether)?

4116

☒ Yes ☐ No

Identify the exchange(s)/custodian(s)/broker(s)/platform(s) where **spot digital assets** are currently invested in or held for proprietary accounts:

If the firm self-custodies digital assets/uses a non-custodial wallet, add "Self-Custody" to the list.

Add 	Name	Location

Identify the types of **spot digital assets** the firm's proprietary accounts invest in or hold (Respond to all):

4119A

☐ Bitcoin

4119B

☐ Ether

4119E

☐ Stablecoin

4119C

☒ Other

Indicate what other type of **spot digital assets** the firm invests in or holds for its proprietary accounts.

4119D

Does the firm currently participate in any **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) for its proprietary accounts?

4164

☒ Yes ☐ No

Identify the type of activity (Respond to all):

4165A

☐ Lending

4165B

☐ Borrowing

4165C

☐ Staking

4165D

☒ Other

Briefly explain the other type of **spot digital asset activities** the firm participates in for its proprietary accounts.

4165E

Digital Asset Products – IB/FCM/RFED

Digital Assets Derivatives

Did the firm solicit/introduce/accept orders in **digital asset derivatives** (e.g., bitcoin/ether futures, options, swaps, including perpetual futures or swaps) for customer accounts within the last 12 months?

9808

☒ Yes ☐ No



Enter the approximate number of customer accounts that have open positions in **digital asset derivatives** (e.g., bitcoin/ether futures, options, or swaps, including perpetual futures or swaps):

4120

If the firm solicited or accepted an order in digital asset derivatives (e.g., bitcoin/ether futures, options, or swaps) within the last 12 months, but currently does not have any customer accounts that have accepted orders involving digital asset derivatives, then the firm should answer 0.

Close help

Did the firm and/or its employees manage a customer account that executed a transaction or had an open position in **digital asset derivatives** (e.g., bitcoin/ether futures, options, or swaps) within the last 12 months?

4131

☒ Yes ☐ No



Enter the approximate number of current customer accounts managed by the firm and/or its employees that have transacted in **digital asset derivatives**:

4132

If the firm and/or its employees managed customer accounts that transacted in digital asset derivatives (e.g., bitcoin/ether futures, options, or swaps) within the last 12 months, but currently does not have any customer accounts that it and/or its employees manage that transacted in digital asset derivatives, then they should answer 0.

Close help

Identify the exchange(s) where **digital asset derivatives** are **currently** traded for customer accounts:

Click to Add/Edit/Delete Exchange(s) below:

Exchange Name	Location
No Data	

Identify the types of **digital asset derivatives** that customer accounts **currently** trade (Respond to all):

4123A

☐ Bitcoin Futures

4123B

☐ Bitcoin Options

4123C

☐ Ether Futures

4123G

☐ Ether Options

4123D

☐ Micro Bitcoin Futures

4123H

☐ Perpetual futures/swaps

4123E

☒ Other

Enter the type of other **digital asset derivatives**.

4136G

Did the firm engage in **digital asset derivatives** (e.g., bitcoin/ether futures, options or swaps, including perpetual futures or swaps) activity in any other capacity (e.g., execution/give-up business) within the last 12 months for customer accounts?

4137

☒ Yes ☐ No

Briefly describe what other types of **digital asset derivatives** activities are **currently** being conducted for customer accounts.

4138

Spot Digital Asset Products

Did the firm solicit/introduce/accept orders in **spot digital assets** (e.g., bitcoin, ether) for customer accounts within the last 12 months?

4028

☒ Yes ☐ No

Enter the approximate number of customer accounts that **currently** invest in or hold **spot digital assets** (e.g., bitcoin and ether):

4112

Did the firm and/or its employees manage a customer account(s) that executed a transaction or had an open position in **spot digital assets** (e.g., bitcoin, ether) within the last 12 months?


4152

☒ Yes ☐ No

Enter the approximate number of customer accounts managed by the firm or its employees that currently transact in or hold **spot digital assets**:

4153

Identify the exchange(s)/custodian(s)/broker(s)/platform(s) where **spot digital assets** are **currently** invested or held for customer accounts:

Add 	Name	Location

Identify the types of **spot digital assets** that your customers are currently invested in or holding (Respond to all):

4115A

☐ Bitcoin

4115B

☐ Ether

4154E

☐ Stablecoin

4115C

☒ Other

Indicate what other type of **spot digital asset**.

4155

Has the firm engaged in any **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) for customers within the last 12 months?

4156

☒ Yes ☐ No

Identify the types of **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) the firm **currently** engages in for customers (Respond to all):

4157A

☐ Lending

4157B

☐ Borrowing

4157C

☐ Staking

4157D

☒ Other

Briefly explain the other type of **spot digital asset activities** the firm engages in for customers.

4158

Firm Proprietary Activities


Does the firm have proprietary account(s), as defined in CFTC Regulation 1.3, that currently invest in or hold **spot digital assets** (e.g., bitcoin, ether)?

4116

☒ Yes ☐ No

Identify the exchange(s)/custodian(s)/broker(s)/platform(s) where **spot digital assets** are currently invested in or held for proprietary accounts:

*If the firm self-custodies digital assets/uses a non-custodial wallet, add "Self-Custody" to the list.*

Add 	Name	Location

Identify the types of **spot digital assets** the firm's proprietary accounts invest in or hold (Respond to all):

4119A

☐ Bitcoin

4119B

☐ Ether

4119E

☐ Stablecoin

4119C

☒ Other

Does the firm currently participate in any **other spot digital asset activity** (e.g., lending, borrowing, staking or other yield-producing activities) for its proprietary accounts?

4164

☒ Yes ☐ No

Identify the type of activity (Respond to all):

4165A

☐ Lending

4165B

☐ Borrowing

4165C

☐ Staking

4165D

☒ Other

Briefly explain the other type of **spot digital asset activities** the firm participates in for its proprietary accounts.

4165E

Micro Contracts and Event Contracts - CPO

Micro Contracts



Does the firm currently operate a pool (exempt or non-exempt) that trades **Micro contracts**?

2016

☒ Yes ☐ No

Micro contracts represent an even smaller fractional value of a standard futures or e-mini contract (e.g., micro, nano, deci, small).

Close help

2017

Are any of the pool(s) listed with NFA?

☒ Yes ☐ No

Add	Pool ID and Name

Event Contracts



Does the firm currently operate a pool (exempt or non-exempt) that trades **Event contracts**?

2226

☒ Yes ☐ No

Event contracts are a type of derivative contract, typically with a binary payoff structure, based on the outcome of an underlying occurrence or event.

Close help

2227

Are any of the pool(s) listed with NFA?

☒ Yes ☐ No

Add	Pool ID and Name

Firm Proprietary Activities



Does the firm currently trade **Micro contracts** for its proprietary accounts?

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

2087

Does the firm currently trade **Event contracts** for its proprietary accounts?

☒ Yes ☐ No

# Micro Contracts and Event Contracts - CTA

## Micro Contracts

?

Does the firm currently manage client accounts that trade **Micro contracts**?

2025

☒ Yes ☐ No

Micro contracts represent an even smaller fractional value of a standard futures or e-mini contract (e.g., micro, nano, deci, small).

Close help

?

Enter the approximate number of client accounts (include any pool account(s) operated by third-party operators) managed by the firm that trade **Micro contracts**:

2026

Pool accounts operated by the firm as a CPO or exempt CPO should not be included.

Close help

?

Enter the approximate percentage of the clients' assets under management (AUM) that make up investments in **Micro contracts**:

2027

If percentage is greater than 0 but less than 1%, round up to the next percentage.

Close help

Identify the exchange(s) where **Micro contracts** are traded for managed accounts:

Click to Add/Delete Exchange(s) below:

Exchange Name	Location
No Data	

## Event Contracts

?

Does the firm currently manage client accounts that trade **Event contracts**?

2235

☒ Yes ☐ No

Event contracts are a type of derivative contract, typically with a binary payoff structure, based on the outcome of an underlying occurrence or event.

Close help

?

Enter the approximate number of client accounts (include any pool account(s) operated by third-party operators) managed by the firm that trade **Event contracts**:

2236

Pool accounts operated by the firm as a CPO or exempt CPO should not be included.

Close help

?

Enter the approximate percentage of the clients' assets under management (AUM) that make up investments in **Event contracts**:

2237

If percentage is greater than 0 but less than 1%, round up to the next percentage.

Close help

Identify the exchange(s) where **Event contracts** are traded for managed accounts:

Click to Add/Delete Exchange(s) below:

Micro and Event Contract Activity - IB/FCM/RFED

Micro Contracts

?

Does the firm currently have **Customer** accounts that trade **Micro contracts**?

2001

☒ Yes ☐ No

Micro contracts represent an even smaller fractional value of a standard futures or e-mini contract (e.g., micro, nano, deci, small).

Close help

Enter the approximate number of **Customer** accounts that trade **Micro contracts**:

2002

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

2003

☒ Yes ☐ No

Indicate the minimum balance to fund an account for customers trading in **Micro contracts**:

2004

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

2005

☒ Yes ☐ No

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

2006

?

Does the firm currently have **Non-Customer** accounts that trade **Micro contracts**?

2107

☒ Yes ☐ No

Micro contracts represent an even smaller fractional value of a standard futures or e-mini contract (e.g., micro, nano, deci, small).

Close help

Identify the exchange(s) where the firm transacts in **Micro contracts**:

Click to Add/Delete Exchange(s) below:

Exchange Name	Location
No Data	

Event Contracts

?

Does the firm currently have **Customer** accounts that trade **Event contracts**?

2201

☒ Yes ☐ No

Event contracts are a type of derivative contract, typically with a binary payoff structure, based on the outcome of an underlying occurrence or event.

Close help

Enter the approximate number of **Customer** accounts that trade **Event contracts**:

Account Type	Approximate Number of Customer Accounts Trading Event Contracts	
Non-discretionary		
Discretionary – Managed by firm/employee via Power of Attorney (POA)		
Discretionary – Managed by firm/employee via Letter of Direction (LOD)		
Discretionary – Managed by 3rd party		
Hedge Accounts		

Is the minimum initial funding level for customers trading **Event contracts** lower than the minimum required for funding in other standard size products?

2203

☒ Yes ☐ No

Indicate the minimum balance to fund an account for customers trading in **Event contracts**:

2204

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

2205

☒ Yes ☐ No

Indicate the average round-turn commission charged to customers trading in **Event contracts**:

2206

 Does the firm currently have **Non-Customer** accounts that trade **Event contracts**?

2207

☒ Yes ☐ No

Event contracts are a type of derivative contract, typically with a binary payoff structure, based on the outcome of an underlying occurrence or event.


Close help

Identify the exchange(s) where the firm transacts in **Event contracts**:

Click to Add/Delete Exchange(s) below:

Exchange Name	Location
TEST TESTER	UNITED STATES

Firm Proprietary Activities

 Does the firm currently trade **Micro contracts** for its proprietary accounts?

2037

☒ Yes ☐ No

Micro contracts represent an even smaller fractional value of a standard futures or e-mini contract (e.g., micro, nano, deci, small).

Close help

Does the firm currently trade **Event contracts** for its proprietary accounts?

2087

☒ Yes ☐ No



Is the minimum initial funding level for customers trading **Event contracts** lower than the minimum required for funding in other standard size products?

2203

☒ Yes ☐ No

Indicate the minimum balance to fund an account for customers trading in **Event contracts**:

2204

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

2205

☒ Yes ☐ No

Indicate the average round-turn commission charged to customers trading in **Event contracts**:

2206



Does the firm currently have **Non-Customer** accounts that trade **Event contracts**?

2207

☒ Yes ☐ No

Event contracts are a type of derivative contract, typically with a binary payoff structure, based on the outcome of an underlying occurrence or event.

Close help

Identify the exchange(s) where the firm transacts in **Event contracts**:

Click to Add/Delete Exchange(s) below:

Exchange Name	Location
TEST TESTER	UNITED STATES

#### Firm Proprietary Activities



Does the firm currently trade **Micro contracts** for its proprietary accounts?

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

Does the firm currently trade **Event contracts** for its proprietary accounts?

2087

☒ Yes ☐ No

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Miscellaneous

4030

Is the firm a publicly traded company?

☒ Yes ☐ No

4031

Provide the equity ticker symbol:

4230

Does the firm have a principal that has a 10% or more ownership interest in the firm and is a publicly traded company?

☒ Yes ☐ No

4231

Provide the equity ticker symbol for the principal:

0251

?

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.*

☒ 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

9800

Does the firm have a Risk Management Department?

☒ Yes ☐ No

4032

Does the firm have a designated Chief Compliance Officer?

☒ Yes ☐ No

4050

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?

☒ 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](#).

NFA ID	Name	Start Date
No Data		

4055

Do any of the pools, exempt or non-exempt, operated by the firm clear trades on a contract market through a company that is not registered as an FCM?

☒ Yes ☐ No


Indicate whether the firm utilize third-party service providers for its back and middle office in the following areas:

8300

Critical Risk Systems

☒ Yes ☐ No

If Yes, enter the name of the service providers and location.


Add 	Name	Location

8301

Account Software

☒ Yes ☐ No

If Yes, enter the name of the service providers and location.


Add 	Name	Location

8302

Trading Platform (including order management)

☒ Yes ☐ No

If Yes, enter the name of the service providers and location.


Add 	Name	Location

8303

Equity Systems (i.e., account statements or confirmations)

☒ Yes ☐ No

If Yes, enter the name of the service providers and location.


Add 	Name	Location

8304

Trade Reporting

☒ Yes ☐ No

If Yes, enter the name of the service providers and location.


Add 	Name	Location

8305

Surveillance System

☒ Yes ☐ No

If Yes, enter the name of the service providers and location.

Add 	Name	Location

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

Province

0187

Country

0188

Zip Code

0189

Primary Phone Number

0190

Secondary Phone Number

0191

Email Address

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## Not Doing Business

The information you provide on your Questionnaire is used to populate the firm's current status on NFA's BASIC web page. Based on your questionnaire, the firm will be identified in NFA's BASIC as not currently conducting any commodity interest business. If this is not accurate, please update the questionnaire immediately, or contact NFA, to provide details on the firm's operations.

If the questionnaire is accurate, and the firm is not conducting any commodity interest business, please 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.

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