Relationships

⑦ Does the firm **introduce** accounts to a registered Futures Commission Merchant (FCM) and/or an Exempt Foreign Firm?

5021 ◉ Yes ○ No

See CFTC Reg 30.10 for definition of what qualifies as an Exempt Foreign Firm.

Close help

Identify the FCM(s) and/or Exempt Foreign Firms:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Does the firm introduce **retail** customer accounts to a registered Retail Foreign Exchange Dealer (RFED) or a designated Forex Dealer Member (FDM)?

5022 ◉ Yes ○ No

Identify the RFED or FDM:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Does the firm introduce counterparties to engage in **swap transactions** with a registered Swap Dealer?

5024 ◉ Yes ○ No

Identify the registered Swap Dealer(s) with which you engage, as applicable:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Are these transactions submitted to a Swap Execution Facility (SEF) for execution?

5026 ◉ Yes ○ No

Identify the SEFs:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Block Trading

Does the firm facilitate (e.g., arrange and/or negotiate) **block trades** in commodity interest products on behalf of customers? *For purposes of this question, a block trade is a transaction that is negotiated off an exchange's trading facility and then posted on the trading facility, as permitted under exchange rules.*

5027

◉ Yes ○ No

Futures?

5031

◉ Yes ○ No

See NFA Bylaw 1507 for the definition of futures.

Close help

Swaps?

5032

◉ Yes ○ No

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

Close help

Identify the DCMs through which the firm submits trades:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Identify the SEFs through which the firm submits trades:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
No Data		

Is approximately 75% or more of the firm's trades comprised of facilitating block trades?

5033

◉ Yes ○ No

Check all of the product sectors that apply:

5034
☐ Interest Rate and Cross-Currency

5035
☐ Credit Default

5036
☐ Foreign Exchange

5037
☐ Equity

5038
☐ Commodity

5039
☐ Metals

5040
☐ Agricultural

5041
☐ Energy

5042
☐ Other

5043
☐ Other

How does the firm generate revenue from facilitating block trades?

5064
☐ Commission

5065
☐ Mark Up

5066
☐ Other Fee

Indicate type of fee [   ]

What is the approximate value of revenue generated
from facilitating block trades **on behalf of customers**
during the prior calendar year?

5068
[   ]

Does a **firm proprietary account**, as defined in CFTC
Regulation §1.3, engage in block transactions?

5071
◉ Yes ○ No

Does a **firm proprietary account**, as defined
in CFTC Regulation §1.3, act as the
counterparty at any time to a firm's
customer(s) on a block trade?

5072
◉ Yes ○ No

Exchange for Related Positions (EFRP)

❓ Does the firm engage in exchange-for-related position
transactions on **behalf of customers**?

5073
◉ Yes ○ No

EFRP transactions include the exchanges of:
- Exchange for Physical (EFP) - A position in the underlying physical instrument for a corresponding futures position.
- Exchange for Risk (EFR) - A position in an Over-the-Counter (OTC) swap or other OTC derivative in the same or related instrument for a position in the corresponding futures contract.
- Exchange of Options for Options (EOO) - A position in an OTC option (or other OTC contract with similar characteristics) in the same or related instrument for an option position.

❓ Exchange for Physical

5074
◉ Yes ○ No

Exchange for Physical (EFP) - A position in the underlying physical instrument for a corresponding futures position.

Close help

? Exchange of Option for Option 5050

○ ● Yes ○ No

Exchange of Options for Options (EOO) - A position in an OTC option (or other OTC contract with similar characteristics) in the same or related instrument for an option position.

Close help

? Exchange for Risk (OTC derivative) 5076

● Yes ○ No

Exchange for Risk (EFR) - A position in an Over-the-Counter (OTC) swap or other OTC derivative in the same or related instrument for a position in the corresponding futures contract.

Close help

Check all of the product sectors that apply:

5077
☐ Interest Rate and Cross-Currency

5078
☐ Credit Default

5079
☐ Foreign Exchange

5047
☐ Equity

5148
☐ Commodity

    5149
    ☐ Metals

    5150
    ☐ Agricultural

    5151
    ☐ Energy

    5152
    ☐ Other

5086
☐ Other

How does the firm generate revenue from exchange-for-related position transactions?

5187
☐ Commission

5088
☐ Mark Up

5089
☐ Other Fee

Indicate type of fee [   ]

What was the approximate value of revenue generated from facilitating exchange-for-related position transactions during the **prior calendar year** on behalf of customers?

5091

Does a **firm proprietary account**, as defined in CFTC Regulation §1.3, engage in exchange-for-related position transactions?

5092
○ Yes ○ No

Does a **firm proprietary account**, as defined in CFTC Regulation §1.3, act as the counterparty at any time to a **firm's customer(s)** on an exchange-for-related position transaction?

5093
◉ Yes ○ No

Give-up or Execution Business

Does the firm engage in give-up or execution business **on behalf of customers**?

5094
◉ Yes ○ No

Futures?

5095
◉ Yes ○ No

See NFA Bylaw 1507 for the definition of futures.

Close help

Swaps?

5096
◉ Yes ○ No

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

Close help

Identify the DCMs:

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
	No Data	

Identify the Swap Execution Facilities (SEFs):

MANAGE RELATIONSHIPS

NFA ID	Name	Start Date
	No Data	

Is approximately 75% or more of the firm's trades comprised of give-up or execution business?

5097
◉ Yes ○ No

Check all of the product sectors that apply for which the firm engages in give-up or execution business on behalf of customers:

5098
☐ Interest Rate and Cross-Currency

5099
☐ Credit Default

5100
☐ Foreign Exchange

5101
☐ Equity

5102
☐ Commodity

5103
☐ Metals

5104
☐ Agricultural

5105
☐ Energy

5106
☐ Other

5107
☐ Other

How does the firm generate revenue from its give-up or execution business?

5108
☐ Commission

5109
☐ Mark Up

5110
☐ Other Fee

Indicate type of fee [   ]

What was the approximate value of revenue generated from facilitating give-up and execution business on behalf of customers during the prior calendar year?

5112
[   ]

Does a **firm proprietary account**, as defined in CFTC Regulation §1.3, engage in give-up transactions?

5113
◉ Yes ○ No

Trailing Commissions

;
Does the firm receive trailing commissions to solicit for subscriptions in a commodity pool and/or solicit discretionary accounts to be managed by CTAs?

5114
◉ Yes ○ No

Is approximately 75% or more of the Firm's commodity interest business revenue comprised of receiving trailing commissions for subscriptions in commodity pool(s) and/or CTA managed accounts?

5115
◉ Yes ○ No

Customer Base

Complete the following table regarding the firm's **customer asset base**. Identify the approximate number of customers by account type that engage in **specified commodity interest transactions**. *See the help text for applicable definitions.*

- See NFA Bylaw 1507 for the definition of futures
- See CFTC Regulation §5.1 and Commodity Exchange Act §2(c)(2)(b) or §2(c)(2)(c) for the definition of forex.
- See CFTC Regulation §1.3 and Commodity Exchange Act §1a(47) for the definition of a swap.
- See Interpretive Notice 9055 for the definition of Letter of Direction (LOD).

Close help

Account Type	Approximate Number of Futures and Options on Futures Customer Accounts	Approximate Number of Retail Forex Customer Accounts	Approximate Number of Swaps Customer Accounts
Non-discretionary	1	1	1
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			

What is the approximate net liquidating value of the firm's current customer accounts that engage in **commodity interest** products?
`5230`

What is the approximate percentage of the firm's current customers that are **domiciled/organized outside the United States**?
`5231`

Revenue Information

What is the approximate value of revenue generated from exchange traded **futures and/or options on futures** transactions during the last 12 months?
`0042`

What is the approximate value of revenue generated from **retail off-exchange foreign currency transactions (forex)** during the last 12 months?
`9753`

What is the approximate value of revenue generated from **swaps** transactions during the last 12 months?
`5234`

What is the approximate percentage of customer accounts that pay **round-turn commissions**, fees and other charges within the following ranges?

Accounts Charged	None	Up to 10%	11-25%	26-49%	50-75%	76-99%	100%
$0.01-$49	☐	☐	☐	☐	☐	☐	☐
$50-$99	☐	☐	☐	☐	☐	☐	☐
$100+	☐	☐	☐	☐	☐	☐	☐

Help Text:
Ensure the sum of percentages of customers that pay round-turn commissions, fees, and other charges within the stated ranges are within mathematical bounds. The firm must select a percentage for each of the ranges, and ensure the total percentage does not exceed 100%

`0253`

What is the highest total **round-turn** commissions and other fees charged to customers?

Check all other fees charged by the firm during the last 12 months.

`137A`
☐ Mark-up

`137B`
☐ Upfront fee

137C

☐ Other Fee

Indicate type of fee: [   ]

137E

☐ The firm did not charge any other fees during the last 12 months.

Has the firm over the preceding three years generated **more than $5 million in aggregate gross revenue** from its activities as an introducing broker?

0138

◉ Yes ○ No

Does the firm keep all pre-trade communications required by CFTC Regulation 1.35(a)(1)(iii)?

0139

◉ Yes ○ No

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