


Relationships

 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 [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 [CFRC Regulation §1.3](#), engage in block transactions?

5071


Yes No

Does a firm proprietary account, as defined in [CFRC 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 (EEO) - 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 CFRC 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

- 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(xxx) 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

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.

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	<input type="text"/>	<input type="text"/>	<input type="text"/>
Discretionary – Managed by firm/employee via Power of Attorney (POA)	<input type="text"/>	<input type="text"/>	<input type="text"/>
Discretionary – Managed by firm/employee via Letter of Direction (LOD)	<input type="text"/>	<input type="text"/>	<input type="text"/>
Discretionary – Managed by 3rd party	<input type="text"/>	<input type="text"/>	<input type="text"/>
Hedge Accounts	<input type="text"/>	<input type="text"/>	<input type="text"/>

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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$50-\$99	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
\$100+	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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%.



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

0253

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

◀ Previous

Save



Next ▶
