

## 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

1000

Last Name

1001

Title

1002

Email Address

1003

Phone Number

1004

1005

Add Secondary Contact

#### Secondary Contact

First Name

1006

Last Name

1007

Title

1008

Email Address

1009

Phone Number

1010



Information included is current as of :

4000



### 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.

0260

*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.*

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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)?  Yes  No 0261

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

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## 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

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**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:

## Virtual Currency Products

Does the firm currently operate a pool (exempt or non-exempt) that executed a transaction or had an open position in **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

9810

Yes  No



Is the pool(s) listed with NFA?

4100

Yes  No

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

Close help

Does the firm currently operate a pool (exempt or non-exempt) that invests in another pool that trades in or has the ability to invest in **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

4101

Yes  No



Is the pool(s) listed with NFA?

4102

Yes  No

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

Close help

Does the firm currently **operate a pool** (exempt or non-exempt) that executed a transaction or had an open position in a **virtual currency derivative** (e.g., bitcoin future, option or swap) within the last 12 months?

9811

Yes  No



Is the pool(s) listed with NFA?

4103

Yes  No

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

Close help

Does the firm currently operate any pool (exempt or non-exempt) that invests in another pool that trades in or has the ability to invest in **virtual currency derivatives** (e.g., bitcoin futures, options, or swaps)?

4104

Yes  No



Is the pool(s) listed with NFA?

4105

Yes  No

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

Close help

Did the firm manage an account—other than an exempt or non-exempt pool the firm operates—that executed a transaction or had an open position in a **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

9809

Yes  No



Enter the approximate number of **customer** accounts (including pools) managed by the firm and/or its employees that currently transact in or hold **spot/physical virtual currency** positions:

4106

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

Close help

Enter the approximate percentage of the customers' assets under management (AUM) that make up investments in **spot/physical virtual currency** products:


4107

Identify the types of **spot/physical virtual currency** products in which your customers transact (select all that apply):

4108A  
 Bitcoin  
4108B  
 Ethereum  
4108C  
 Other

Did the firm **manage** an account—other than an exempt or non-exempt pool the firm operates—that executed a transaction or had an open position in a **virtual currency derivative** (e.g., bitcoin futures, option or swap) within the last 12 months?

9807  
 Yes  No

 Enter the approximate number of customer accounts (including pools) managed by the firm and/or its employees that currently trade or hold open positions in **virtual currency derivatives**:

4109

Do not include pool accounts that the firm operates as a registered CPO.

Close help

Enter the approximate percentage of the customers' assets under management (AUM) that make up investments in **virtual currency derivatives**:

4110

Identify the types of **virtual currency derivative** products that your customers transact in (select all that apply):

4111A  
 Bitcoin Futures  
4111B  
 Bitcoin Options  
4111C  
 Ether Futures  
4111D  
 Micro Bitcoin Futures  
4111E  
 Other

Did the firm solicit or accept an order in a **spot/physical virtual currency** (e.g., bitcoin, ethereum) within the last 12 months?

4028  
 Yes  No

Enter the approximate number of customers for which your firm currently has accepted orders involving **spot/physical virtual currency**:

4112

Enter the number of **spot/physical virtual currency long** positions currently held by customers:

4113

Enter the number of **spot/physical virtual currency short** positions currently held by customers:

4114

Identify the **spot/physical virtual currency** products that customers currently transact in: (Select all that apply)

4115A  
 Bitcoin  
4115B  
 Ethereum  
4115C  
 Other

Does the firm have proprietary account(s), as defined in CFTC Regulation 1.3, that engages in **spot/physical virtual currency** transactions?  Yes  No

4116

Enter the number of **spot/physical virtual currency long** positions currently held for proprietary purposes (as defined in CFTC Regulation 1.3):

4117

Enter the number of **spot/physical virtual currency short** positions currently held for proprietary purposes (as defined in CFTC Regulation 1.3):

4118

Identify the **spot/physical virtual currency** products that are currently held by the firm for proprietary purposes (as defined in CFTC Regulation 1.3): (Select all that apply)

4119A

Bitcoin

4119B

Ethereum

4119C

Other

9808

Did the firm solicit or accept an order in **virtual currency derivatives (e.g., bitcoin futures, options or swaps)** within the last 12 months?  Yes  No



Enter the approximate number of customer accounts that currently have open positions involving a **virtual currency derivative**.

4120

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

Close help

Enter the number of open **virtual currency derivative long** positions currently held by customers:

4121

Enter the number of open **virtual currency derivative short** positions currently held by customers:

4122

Identify the types of **virtual currency derivative** products traded: (Select all that apply)

4123A

Bitcoin Futures

4123B

Bitcoin Options

4123C

Ether Futures

4123D

Micro Bitcoin Futures

4123E

Other

Does the firm have a proprietary account(s), as defined in CFTC Regulation 1.3, that currently engages in **virtual currency derivative** transactions?

4124

Yes  No

Enter the number of open **virtual currency derivative long positions** currently held for proprietary purposes:

4125

Enter the number of open **virtual currency derivative short positions** currently held for proprietary purposes:

4126

Identify the types of **virtual currency derivative** products traded for proprietary purposes: (Select all that apply)

4127A

Bitcoin Futures

4127B

Bitcoin Options

4127C

Ether Futures

4127D

Micro Bitcoin Futures

4127E

Other

4029

Yes  No

4128

Yes  No

Did the firm act as a counterparty to **virtual currency OTC products** (including swaps and NDFs) within the past 12 months?

Does the firm participate in transactions which involve lending or borrowing in **spot/physical virtual currency**?

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# Micro Contract Products



Does the firm currently have customers that engage in transactions in Micro contracts?

2001

Yes  No

Micro contracts represent an even smaller fraction of value of the normal futures and corresponding e-mini, if applicable.

Close help

Enter the approximate number of customer accounts that trade in Micro contracts:

2002

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

2003

Yes  No

Indicate the minimum account funding level for customers trading in Micro contracts:

2004

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

2005

Yes  No

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

2006

Enter the number of open Micro contract long positions currently held by customers:

2007

Enter the number of open Micro contract short positions currently held by customers:

2008

Identify the types of Micro contracts that your customers transact in: (check all that apply)

2009A

Equity

2009B

Fixed Income

2009C

Metals

2009D

Energy

2009E

FX Futures

2009F

Other:

2016

Yes  No



Does the firm currently operate a pool(s) that engages in transactions in Micro contracts?

Micro contracts represent an even smaller fraction of value of the normal futures and corresponding e-mini, if applicable.

Close help



Is the pool(s) listed with NFA?

2017

Yes  No

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

Close help

Enter the types of Micro contracts traded by the pool(s):

2018A

Equity

2018B

Fixed Income

2018C

Metals

2018D

Energy

2018E

FX Futures

2018F

Other:



Does the firm currently trade in Micro contracts for proprietary purposes?

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

Enter the number of open long proprietary positions in Micro contracts:

2038

Enter the number of open short proprietary positions in Micro contracts:

2039

Identify the types of Micro contracts traded for proprietary purposes:

2040A

Equity

2040B

Fixed Income

2040C

Metals

2040D

Energy

2040E

FX Futures

2040F

Other:

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## Miscellaneous

Is the firm a publicly traded company?

4030

Yes  No

Provide the equity ticker symbol:

4031

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

4230

Yes  No

Provide the equity ticker symbol:for the principal

4231

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.*

0251

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

Does the firm have a Risk Management Department?

9800

Yes  No

Does the firm have a designated Chief Compliance Officer?

4032

Yes  No

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?

4050

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](#).

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## 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 <input type="text"/>
Last Name	0165 <input type="text"/>
Street Address	0168 <input type="text"/>
Street Address 2	0169 <input type="text"/>
Street Address 3	0170 <input type="text"/>
City	0171 <input type="text"/>
State	0172 <input type="text" value="--Select State--"/>
Province	0173 <input type="text"/>
Country	0174 <input type="text" value="--Select Country--"/>
Zip Code	0175 <input type="text"/>
Primary Phone Number	0176 <input type="text"/>
Secondary Phone Number	0177 <input type="text"/>
Email Address	0164 <input type="text"/>

### Secondary Contact Information

First Name	0180 <input type="text"/>
Last Name	0179 <input type="text"/>
Street Address	0182 <input type="text"/>

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

Based on the firm's responses, the firm does not appear to be doing commodity interest business. 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.

4012

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