

## **Independent IB Reporting Requirements**

Description	When	Information Requested	How
Financial Reports –audited	Annually  1-FR-IB due 90 days after fiscal year end; FOCUS due 60 days after fiscal year end	See CFTC Regulation 1.10(d)(2) for the specific reports required	1-FR-IB filed by <u>EasyFile</u> FOCUS reports filed by mail or by <u>WinJammer<sup>TM</sup></u>
Financial Reportsunaudited	Semi-annually for 1-FR-IB as of the middle and the close of each fiscal year, due within 17 business days of period end.  FOCUS due on same cycle as that required by FINRA and within 17 business days after the required date.	See CFTC Regulation 1.10(d)(1) for the specific reports required	1-FR-IB filed by EasyFile  FOCUS reports filed by WinJammer™
Subordinated Loan Agreements (SLA) Standard forms are available from NFA	If applicable	The loan and all changes and amendments must be approved by NFA before the effective date. If approved by DEA, please file approval letter with NFA.	WinJammer <sup>™</sup> for broker dealer IBs; and <u>EasyFile</u> for non-broker dealer IBs
NFA Questionnaire	Annually, to coincide with annual dues	NFA sends an annual notice indicating how to access the questionnaire.	Web-based filing
Notice of undercapitalization	If applicable	Immediate notification when capital falls below level set forth in NFA Financial Requirements. A 1-FR-IB/FOCUS must follow within 24 hours.	Notification by phone and confirmed by fax or web-based filing. * Statement by fax or web-based filing. ^*
Non-current books and records	If applicable	Same day notification when required books and records are not current. A written report stating corrective action must follow within 48 hours.	Fax or web-based filing ^*
Cybersecurity Incident	If applicable	Prompt notification is required for certain cybersecurity incidents. See NFA Interpretive Notice 9070 for further information.	<u>EasyFile</u>
Net capital computations	Monthly Completed within 17 business days of month end	Monthly net capital computations must be maintained; however, they do not need to be sent to NFA unless they fall into one of the above categories.	N/A
Material Inadequacies noted by CPA in audited financials	If applicable	Notification of such material inadequacy within 24 hours. A written report stating corrective action must follow within 48 hours.	Fax or web-based filing ^*
Request for extension of time to file financial reports	If applicable	If firm is also registered as a B/D, must file request and DEA response with NFA.	Mail or web-based filing *
Request to change fiscal year end	If applicable	If firm is also registered as a B/D, must file request and DEA response with NFA.	Mail or web-based filing *

The above information can be found in <u>NFA Financial Requirements Section 5</u>, <u>NFA Interpretive Notice 9070</u>, on NFA's website at <u>www.nfa.futures.org</u>, and in CFTC Regulations 1.10, 1.12, and 1.17.

Fax # for reporting to NFA is (312) 781-1467 or (212) 964-3913

All reporting by mail is done through NFA's Chicago office:

National Futures Association Compliance Department 320 South Canal, Suite 2400 Chicago, IL 60606

<sup>^</sup> An IB must also make a similar filing with any FCMs that carry its accounts, and its self-regulatory organization.

<sup>\*</sup> Web-based notice filings are filed via the same system (EasyFile or WinJammer) that an IB uses to file its Financial Reports.