

Supplemental Questionnaire for CTAs

Disclosure Document (CFTC Regulations 4.31, 4.34, 4.35 and 4.36, NFA Compliance Rules 2-13, 2-34 and 2-35, and NFA Interpretive Notices ¶ 9006, ¶ 9023, ¶ 9034, and ¶ 9035)

- Does the Member's disclosure document comply with NFA Rules and CFTC Regulations?
- Does the Member file the disclosure document and any amendments with NFA electronically at least 21 calendar days prior to the date it first intends to solicit clients with the document?
- Does the Member file amendments or a new disclosure document when the existing document becomes materially incomplete or inaccurate?
- Does the Member provide prospective clients with a disclosure document, including any existing amendments, which is dated no more than nine months prior to the date of delivery?
- Does the Member provide existing clients with all amendments to the disclosure document?
- Does the Member maintain signed and dated acknowledgments of receipt of disclosure documents from each client?
- Does the Member calculate fees in accordance with the disclosure document?
- If the Member collects fees directly from clients instead of from the carrying broker, is that amount reflected in the performance record supporting worksheets as an addition and as a debit to net performance?

Bunched Orders (CFTC Regulation 1.35(a-1)(5)(iii)(B)-(C), NFA Compliance Rule 2-10 and NFA Interpretive Notice ¶ 9029)

- Does the Member maintain specific allocation procedures that are fair and equitable so that no account or group of accounts receives consistently favorable or unfavorable treatment?
- Does the Member ensure that all customer accounts have the correct allocation of contracts on each trade?
- Does the Member analyze each trading program at least once a quarter to ensure the allocation method has been fair and equitable? Does the Member maintain records of the review and any deficiencies that are discovered through the review?

Post-Execution Allocation of Bunched Orders (CFTC Regulation 1.35(a-1)(5)(ii), NFA Compliance Rule 2-10 and NFA Interpretive Notice ¶ 9029)

- Does the Member make the following information available to customers upon request? :
(1) the general nature of the allocation methodology; (2) a summary of composite data sufficient for a customer to compare his results with those of other relevant customers

and any account in which the account manager has an interest; and (3) an indication whether any account in which the account manager has an interest can be included with customer accounts in bunched orders. Prior to the end of the trading day, does the Member provide the clearing FCM with information concerning the number of contracts to be allocated to each account included in the bunched order along with instructions for the allocation of split and partial fills among accounts?

- If fill prices are allocated by an FCM, does the Member maintain a written agreement with the FCM that clearly describes that the FCM is responsible for the allocation?

Security Futures Products (Rules and Resources and NFA Compliance Rule 2-37 and Interpretive Notices 9043, 9044, 9049 and 9050)

- Does the Member check the Central Registration Depository (CRD) for information on prospective employees who will be involved in security futures activities and obtain and review a copy of the individual's most recent Form 8-T or U5?
- Does the Member require APs to complete appropriate security futures products training modules?