COMMODITY FUTURES TRADING COMMISSION NATIONAL FUTURES ASSOCIATION

POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Instructions for Using the Form CPO-PQR Template

## READ THESE INSTRUCTIONS CAREFULLY BEFORE COMPLETING OR REVIEWING THE REPORTING FORM.

This document is not a reporting form. Do not send this document to NFA. It is a template that you may use to assist in filing the electronic reporting form with the NFA at: <u>http://www.nfa.futures.org</u>.

You may fill out the template online and save and/or print it when you are finished or you can download the template and/or print it and fill it out later.

## **DEFINED TERMS**

Words that are <u>underlined</u> in this form are defined terms and have the meanings contained in the Definitions of Terms section.

## GENERAL

## **Read the Instructions and Questions Carefully**

Please read the instructions and the questions in this Form CPO-PQR carefully.

In this Form CPO-PQR, "you" means the CPO.

## Call the <u>CFTC</u> with Questions

If there is any question about whether particular information must be provided or about the manner in which particular information must be provided, contact the <u>CFTC</u> for clarification.

CFTC Form CPO-PQR OMB No.: 3038-XXXX

Instructions for Using the Form CPO-PQR Template

## **REPORTING INSTRUCTIONS**

## 1. All <u>CPOs</u> Are Required to Complete and File the <u>Form CPO-PQR</u>

All <u>CPOs</u> are required to complete and file a <u>Form CPO-PQR</u> for each <u>Reporting Period</u> during which they satisfy the definition of <u>CPO</u> and operate at least one <u>Pool</u>. If a pool is operated by <u>Co-CPOs</u>, the <u>CPO</u> with the higher total AUM, aggregated across all pools operated by the CPO should report for that Pool. Further, if a pool is operated by <u>Co-CPOs</u> and one of them is an <u>Investment Adviser</u>, the non-<u>Investment Adviser CPO</u> must file relevant section(s) even though a Form PF was filed for that pool by the <u>Investment Adviser CPO</u>.

## 2. Only Certain Schedules of this Form CPO-PQR Are Required of Certain CPOs

Only certain Schedules of this Form CPO-PQR are required to be completed and filed by certain CPOs.

## Schedule A

Schedule A must be completed and filed by each <u>CPO</u> for every <u>Reporting Period</u> during which they satisfy the definition of <u>CPO</u> and operate at least one <u>Pool</u>. <u>Large</u> CPOs must complete and file a Schedule A within 60 days of the close of the most recent <u>Reporting Period</u> during which they satisfied the definition of <u>Large CPO</u>. All other CPOs must complete and file a Schedule A within 90 days of the close of the calendar year. The information provided herein should be as of the last business day of the reporting period.

Part 1 of Schedule A surveys basic information about the reporting <u>CPO</u>. Part 2 of Schedule A asks for more specific information about each of the <u>CPO's</u> Pools, including questions about the <u>Pool's</u> key relationship and about the <u>Pool's</u> investment positions.

## Substituted Compliance for Schedules B and C

To the extent that a CPO is a dual registrant and is required to file Form PF with the SEC, then it may elect to file Form PF for all pools it, or any related person as defined for purposes of Form PF, may operate.

## Schedule B

Schedule B must be completed and filed annually by <u>Mid-Sized CPOs</u>. <u>Mid-Sized CPOs</u> must complete and file a Schedule B within 90 days of the close of each calendar year during which they satisfied the definition of <u>Mid-Sized</u> <u>CPO</u> and operated at least one <u>Pool</u>. A <u>CPO</u> that qualifies as a <u>Mid-Sized CPO</u> at any point during the calendar year must complete and file a separate Schedule B for each <u>Pool</u> that it operated during the calendar year.

Schedule B must be completed and filed quarterly by <u>Large CPOs</u>. <u>Large CPOs</u> must complete and file a Schedule B within 60 days of the close of the most recent <u>Reporting Period</u> during which they satisfied the definition of <u>Large</u> <u>CPO</u> and operated at least one <u>Pool</u>. A <u>CPO</u> that qualifies as a <u>Large CPO</u> at any point during the <u>Reporting Period</u> must complete and file a separate Schedule B for each <u>Pool</u> that it operated during the <u>Reporting Period</u>.

## Schedule B Substitution

Any <u>Mid-Sized CPO</u> or <u>Large CPO</u> that is: (i) registered with the <u>SEC</u> as an <u>Investment Adviser</u>; and (ii) operated only <u>Pools</u> that satisfy the definition of <u>Private Fund</u> during the calendar year or <u>Reporting Period</u>, respectively, will be deemed to have satisfied its Schedule B filing requirements by completing and filing Sections 1.b. and 1.c. of <u>Form</u> <u>PE</u> for each <u>Pool</u> that it operated during the calendar year or <u>Reporting Period</u>, respectively, in question.

## 2. Only Certain Schedules of this Form CPO-PQR Are Required of Certain CPOs (cont'd)

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Instructions for Using the Form CPO-POR Template Further, to the extent that any Mid-Sized CPO or Large CPO is: (i) registered with the SEC as an Investment Adviser;

and (ii) operated any <u>Pools</u> that do not satisfy the definition of <u>Private Fund</u> during the calendar year or <u>Reporting</u> <u>Period</u>, respectively, and does NOT elect to file Form PF under the substituted compliance provisions of Form PF, they will be required to complete and file a Schedule B for each <u>Pool</u> that it operated during the calendar year or <u>Reporting Period</u>, respectively, that did not satisfy the definition of a <u>Private Fund</u>. Schedule B will need to be completed in addition to the <u>Mid-Sized CPO's</u> or <u>Large CPO's</u> filing <u>Form PF</u> requirements.

Schedule B asks for information about each Pool's creditors, counterparties, borrowings, and clearing mechanisms.

## Schedule C

Schedule C must be completed and filed only by <u>Large CPOs</u>. <u>Large CPOs</u> must complete and file a Schedule C within 60 days of the close of the most recent <u>Reporting Period</u> during which they satisfy the definition of a <u>Large</u> <u>CPO</u> and operate at least one <u>Pool</u>. A <u>CPO</u> that qualifies as a <u>Large CPO</u> at any point during the <u>Reporting Period</u> must complete and file a separate Part 2 of Schedule C for each <u>Large Pool</u> that it operated during the <u>Reporting Period</u>. <u>Period</u>.

## Schedule C Substitution

Any <u>Large CPO</u> that is: (i) registered with the <u>SEC</u> as an <u>Investment Adviser</u>; and (ii) operated only <u>Pools</u> that satisfy the definition of <u>Private Fund</u> during the <u>Reporting Period</u> will be deemed to have satisfied its Schedule C filing requirements by completing and filing the applicable Sections 1 and 2 of <u>Form PF</u> for the <u>Reporting Period</u> in question.

Further, to the extent that any Large CPO is: (i) registered with the SEC as an Investment Adviser; and (ii) operated any Pools that do not satisfy the definition of Private Fund during the Reporting Period and does NOT elect to file Form PF under the substituted compliance provisions of Form PF, they will be required to complete Parts 1 and 2 of Schedule C with respect to the Pool(s) that it operated during the Reporting Period that did not satisfy the definition of a Private Fund. For these Large CPOs, Part 1 of Schedule C will need to be completed with respect to all Pools that they operated during the Reporting Period that did not satisfy the definition of a vill need to be completed with respect to all Large Pools that they operated during the Reporting Period that did not satisfy the definition of satisfy the definition of Private Fund. These Schedule C filings will need to be completed in addition to the Large CPO's filing Form PF requirements.

Part 1 of Schedule C asks for information about the aggregated portfolios of the <u>Pools</u> that were not <u>Private Funds</u> that the <u>Large CPO</u> operated during the <u>Reporting Period</u>.

Part 2 of Schedule C asks for certain risk metrics about the <u>Large Pools</u> that were not <u>Private Funds</u> that the <u>Large</u> <u>CPO</u> operated during the <u>Reporting Period</u>.

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## 3. The CPO May Be Required to Aggregate Information Concerning Certain Types of Pools

For purposes of determining whether a <u>CPO</u> meets the reporting thresholds for Schedules B and/or C of this <u>Form</u> <u>CPO-PQR</u>, the <u>CPO</u> must: (i) aggregate all <u>Parallel Pool Structures</u>, <u>Parallel Managed Accounts</u> and <u>Master Feeder</u> <u>Arrangements</u>; and (ii) treat any <u>Pool</u> or <u>Parallel Managed Account</u> operated by any of its <u>Affiliated Entities</u> as though it was operated by the <u>CPO</u>.

For purposes of determining whether a <u>Pool</u> qualifies as a <u>Large Pool</u> for Schedule C of this <u>Form CPO-PQR</u>, the <u>CPO</u> must: (i) aggregate all <u>Pools</u> that are part of the same <u>Parallel Fund Structure</u> or <u>Master-Feeder Arrangement</u>; (ii) aggregate any <u>Parallel Managed Accounts</u> with the largest <u>Pool</u> to which that <u>Parallel Managed Account</u> relates; and (iii) treat any <u>Pool</u> or <u>Parallel Managed Account</u> operated by any of your <u>Affiliated Entities</u> as though it was operated by the <u>CPO</u>.

However, for the parts of <u>Form CPO-PQR</u> that request information about individual <u>Pools</u>, you must report aggregate information for <u>Parallel Managed Accounts</u> and <u>Master Feeder Arrangements</u> as if each were an individual <u>Pool</u>, but not <u>Parallel Pools</u>. Assets held in <u>Parallel Managed Accounts</u> should be treated as assets of the <u>Pools</u> with which they are aggregated.

## 4. I advise a <u>Pool</u> that invests in other <u>Pools</u> or funds (e.g., a "fund of funds"). How should I treat these investments for purposes of <u>Form CPO-PQR</u>?

<u>Investments in other Pools generally</u>. For purposes of this <u>Form CPO-PQR</u>, you may disregard any <u>Pool's</u> equity investments in other <u>Pools</u>. However, if you disregard these investments, you must do so consistently (e.g., do not include disregarded investments in the <u>net asset value</u> used for determining whether the fund is a "Qualifying Pool"). For Schedule A, Question 11, even if you disregard these assets, you may report the performance of the entire <u>Pool</u> and are not required to recalculate performance in order to exclude these investments. Do not disregard any liabilities, even if incurred in connection with these investments.

<u>Pools that invest substantially all of their assets in other Pools or funds</u>. If you are the <u>CPO</u> for a <u>Pool</u> that: (i) invests substantially all of its assets in the equity of <u>Pools</u> or <u>Private Funds</u> for which you are not the <u>CPO</u>; and (ii) aside from such <u>Pool</u> or <u>Private Fund</u> investments, holds only cash and cash equivalents and instruments acquired for the purpose of hedging currency exposure, then you are only required to complete Schedule A for that <u>Pool</u>. For all other purposes, you should disregard such <u>Pools</u>. For example, where questions request aggregate information regarding the <u>Pools</u> you advise, do not include the assets or liabilities of any such <u>Pool</u>.

Notwithstanding the foregoing, you must include disregarded assets in responding to Schedule A, Question ).

# 5. I am required to aggregate funds or accounts to determine whether I meet a reporting threshold, or I am electing to aggregate funds for reporting purposes. How do I "aggregate" funds or accounts for these purposes?

Where two or more <u>Parallel Pool Structures</u> or <u>Master-Feeder Arrangements</u> are aggregated in accordance with Instruction 3, you must treat the aggregated funds as if they were all one <u>Pool</u>. Investments that a <u>Feeder Fund</u> makes in a <u>Master Fund</u> should be disregarded, but other investments of the <u>feeder fund</u> should be treated as though they were investments of the aggregated fund.

Where you are aggregating <u>dependent parallel managed accounts</u> to determine whether you meet a reporting threshold, assets held in the accounts should be treated as assets of the <u>Pools</u> with which they are aggregated.

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Example 1.	You advise a <u>master-feeder arrangement</u> with one <u>feeder fund</u> . The <u>feeder</u> <u>fund</u> has invested \$500 in the <u>master fund</u> and holds a foreign exchange derivative with a notional value of \$100. The <u>master fund</u> has used the \$500 received from the <u>feeder fund</u> to invest in corporate bonds. Neither fund has any other assets or liabilities.
	For purposes of determining whether the funds comprise a qualifying Pool, this <u>master-feeder arrangement</u> should be treated as a single <u>Pool</u> whose only investments are \$500 in <i>corporate bonds</i> and a foreign exchange derivative with a notional value of \$100. If you elect to aggregate the <u>master- feeder arrangement</u> for reporting purposes, the treatment would be the
Example 2.	same. You advise a <u>parallel pool structure</u> consisting of two <u>pools</u> , named <u>parallel</u> <u>pool</u> A and <u>parallel pool</u> B. You also advise a related <u>dependent parallel</u> <u>managed account</u> . The account and each fund have invested in corporate bonds of Company X and have no other assets or liabilities. The value of <u>parallel pool</u> A's investment is \$400, the value of <u>parallel pool</u> B's investment is \$300 and the value of the account's investment is \$200. For purposes of determining whether either of the <u>parallel pools</u> is a qualifying Pool, the entire <u>parallel fund structure</u> and the related <u>dependent</u> <u>parallel managed account</u> should be treated as a single <u>Pool</u> whose only asset is \$900 of corporate bonds issued by Company X. If you elect to aggregate the <u>parallel fund structure</u> for reporting purposes, you would disregard the <u>dependent parallel managed account</u> , so the result would be a single <u>Pool</u> whose only asset is \$700 of corporate bonds issued by Company X.

## 6. I advise a <u>Pool</u> that invests in entities that are not <u>Pools</u>, *or* are exempt. How should I treat these investments for purposes of <u>Form CPO-PQR</u>?

Except as provided in Instruction 4, investments in funds should be included for all purposes under this <u>Form CPO-PQR</u>. You are not, however, required to "look through" a <u>Pool</u>'s investments in any other entity unless the <u>Form</u> <u>CPO-PQR</u> specifically requests information regarding that entity or the other entity's primary purpose is to hold assets or incur leverage as part of the <u>Pool's</u> investment activities.

## 7. The Form CPO-PQR Must Be Filed Electronically with NFA

All <u>CPOs</u> must file their <u>Forms CPO-PQR</u> electronically using <u>NFA's</u> EasyFile System. <u>NFA's</u> EasyFile System can be accessed through <u>NFA's</u> website at www.nfa.futures.org. You will use the same logon and password for filing your <u>Form CPO-PQR</u> as you would for any other EasyFile filings. Questions regarding your <u>NFA</u> ID# or your use of <u>NFA's</u> EasyFile system should be directed to the <u>NFA's</u> contact information is available on its website.

## 8. All Figures Reported in U.S. Dollars

All questions asking for amounts or investments must be reported in U.S. dollars. Any amounts converted to U.S. dollars must use the conversion rate in effect on the <u>Reporting Date</u>.

#### Instructions for Using the Form CPO-PQR Template 9. Use of U.S. GAAP

All financial information in this Report must be presented and computed in accordance with <u>GAAP</u> consistently applied.

#### **10. Oath and Affirmation**

This <u>Form CPO-PQR</u> will not be accepted unless it is complete and contains an oath or affirmation that, to the best of the knowledge and belief of the individual making the oath or affirmation, the information contained in the document is accurate and complete; provided however, that is shall be unlawful for the individual to make such oath or affirmation if the individual knows or should know that any of the information in this <u>Form CPO-PQR</u> is not accurate and complete.

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Definitions of Terms for the Form CPO-PQR Template

#### DEFINITIONS OF TERMS

**Affiliated Entity:** The term "Affiliated Entity" means any entity is an affiliate of another entity. An entity is an affiliate of another entity if the entity directly or indirectly controls, is controlled by or is under common control with the other entity.

Assets Under Management or AUM: The term "Assets Under Management" or "AUM" means the amount of all assets that are under the control of the <u>CPO</u>.

BP: The term "BP" means basis points.

Broker: The term "Broker" means any entity that provides clearing, prime brokerage or similar services to the Pool.

**CDS:** The term "CDS" means credit default swap.

**CCP:** The term "CCP" means a central counterparty or central clearing house, such as, but not limited to: CC&G, CME Clearing, The Depository Trust & Clearing Corporation (including FICC, NSCC and Euro CCP), EMCF, Eurex Clearing, Fedwire, ICE Clear Europe, ICE Clear U.S., ICE Trust, LCH Clearnet Limited, LCH Clearnet SA, Options Clearing Corporation and SIX x-clear.

**Commodity Futures Trading Commission or CFTC**: The term "Commodity Futures Trading Commission" or "CFTC" means the United States Commodity Futures Trading Commission.

**Commodity Pool or Pool:** The term "Commodity Pool" or "Pool" has the same meaning as "commodity pool" as defined in section 1a(10) of the Commodity Exchange Act.

**Commodity Pool Operator or CPO:** The term "commodity pool operator" or "CPO" has the same meaning as "commodity pool operator" defined in section 1a(11) of the Commodity Exchange Act.

**Commodity Trading Advisor or CTA:** The term "commodity trading advisor" or "CTA" has the same meaning as "commodity trading adviser" as defined in section 1a(12) of the Commodity Exchange Act.

Feeder Fund: See Master-Feeder Arrangement.

**Financial Institution:** The term "financial institution" means any of the following: (i) a bank or savings association, in each case as defined in the Federal Deposit Insurance Act; (ii) a bank holding company or financial holding company, in each case as defined in the Bank Holding Company Act of 1956; (iii) a savings and loan holding company, as defined in the Home Owners' Loan Act; (iv) a Federal credit union, State credit union or State-chartered credit union, as those terms are defined in section 101 of the Federal Credit Union Act; (v) a Farm Credit System institution chartered and subject to the provisions of the Farm Credit Act of 1971; or (vi) an entity chartered or otherwise organized outside the United States that engages in banking activities.

Form CPO-PQR: The term "Form CPO-PQR" means this Form CPO-PQR.

Form PF: The term "Form PF" refers to the Form PF.

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Definitions of Terms for the Form CPO-PQR Template

**GAAP:** The term "GAAP" means U.S. Generally Accepted Accounting Principles.

**Investment Adviser:** The term "Investment Adviser" has the same meaning as "investment adviser" as defined in Section 202(a)(11) of the Investment Advisers Act of 1940.

**Large CPO:** The term "Large CPO" refers to any <u>CPO</u> that had at least \$1.5 billion in aggregated <u>Pool Assets Under</u> <u>Management</u> as of the close of business on any day during the <u>Reporting Period</u>.

**Large Pool:** The term "Large Pool" means any <u>Pool</u> that has a <u>Net Asset Value</u> individually, or in combination with any <u>Parallel Pool Structure</u>, of at least \$500 million as of the close of business on any day during the <u>Reporting</u> <u>Period</u>.

Master Fund: See Master-Feeder Arrangement.

**Master-Feeder Arrangement**: The phrase "Master-Feeder Arrangement" means an arrangement in which one or more funds ("<u>Feeder Funds</u>") invest all or substantially all of their assets in a single fund ("<u>Master Fund</u>"). A fund would also be a <u>Feeder Fund</u> investing in a <u>Master Fund</u> for the purposes of this definition if it issued multiple classes or series of shares or interests and each class (or series) invests substantially all of its assets in shares (or other interests in) a single underlying <u>Master Fund</u>.

**Mid-Sized CPO:** The term "Mid-Sized CPO" refers to any <u>CPO</u> that had at least \$150 million in aggregated <u>Pool</u> <u>Assets Under Management</u> as of the close of business on any day during the <u>Reporting Period</u>.

**National Futures Association or NFA**: The term "National Futures Association" or "NFA" refers to the National Futures Association, a registered futures association under Section 17 of the Commodity Exchange Act.

Negative OTE: The term "Negative OTE" means negative open trade equity.

**Net Asset Value or NAV:** The term "Net Asset Value" or "NAV" has the same meaning as "net asset value" as defined in Commission Rule 4.10(b).

**Non-U.S. Financial Institution:** A "non-U.S. Financial Institution" means any of the following <u>Financial Institutions</u>: (i) a <u>Financial Institution</u> chartered outside the United States; (ii) a subsidiary of a <u>U.S. Financial Institution</u> that is separately incorporated or otherwise organized outside the United States; or (iii) a branch or agency that resides in the United States but has a parent that is a <u>Financial Institution</u> chartered outside the United States.

**OTC:** The term "OTC" means over-the-counter.

**Parallel Managed Account:** The term "Parallel Managed Account" means any managed account or other pool of assets that the <u>CPO</u> operates and that pursues substantially the same investment objective and strategy and invests side-by-side in substantially the same assets as the identified <u>Pool</u>.

CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Definitions of Terms for the Form CPO-PQR Template

**Parallel Pool Structure:** The term "Parallel Pool Structure" means any structure in which one or more <u>Pools</u> pursues substantially the same investment objective and strategy and invests side by side in substantially the same assets as another <u>Pool</u>.

Private Fund: The term "Private Fund" has the same meaning as "private fund" as defined in Form PF.

Positive OTE: The term "Positive OTE" means positive open trade equity.

**Reporting Date:** The term "Reporting Date" means the last calendar day of the <u>Reporting Period</u> for which this <u>Form</u> <u>CPO-PQR</u> is required to be completed and filed. For example, the <u>Reporting Date</u> for the first calendar quarter of a year is March 31; the <u>Reporting Date</u> for the second calendar quarter is June 30.

**Reporting Period:** The term "Reporting Period" means any of the individual calendar quarters (ending March 31, June 30, September 30, and December 31) for <u>Large CPOs</u> and the calendar year end for all other <u>CPOs</u>.

**Trading Manager:** The term "Trading Manager" means any entity or individual with sole or partial authority to invest <u>Pool</u> assets or to allocate <u>Pool</u> assets to other managers or investee <u>Pools</u> (including cash management firms). <u>CTAs</u> and other <u>CPOs</u> can be <u>Trading Managers</u>; however, a <u>CPO</u> should not identify itself as a <u>Trading Manager</u>.

**Secured Borrowing:** The term "Secured Borrowing" means obligations for borrowed money in respect of which the borrower has posted collateral or other credit support. For purposes of this definition, repos are secured borrowings.

Securities and Exchange Commission or SEC: The term "Securities and Exchange Commission" or "SEC" means the United States Securities and Exchange Commission.

**Side Arrangements and Side Letters:** The term "Side Arrangements" or the term "Side Letters" means any arrangement that is extended to less than 100% of the <u>Pool's</u> participants.

**U.S. Financial Institution:** The term "U.S. Financial Institution" means any of the following <u>Financial Institutions</u>: (i) a <u>Financial Institution</u> chartered in the United States (whether federally-chartered or state-chartered); (ii) a subsidiary of a <u>Non-U.S. Financial Institution</u> that is separately incorporated or otherwise organized in the United States; or (iii) a branch or agency that resides outside the United States but has a parent that is a <u>Financial Institution</u> chartered in the United States.

**Unsecured Borrowing:** The term "Unsecured Borrowing" means obligations for borrowed money in respect of which the borrower has not posted collateral or other credit support.

VaR: The term "VaR" means value at risk.

## Form CPO-PQR Template · Schedule A

## INSTRUCTIONS FOR COMPLETING SCHEDULE A

Every <u>CPO</u> is required to complete and file Schedule A of this <u>Form CPO-PQR</u>. This Schedule A must be completed for every <u>Reporting Period</u> during which the <u>CPO</u> operated at least one <u>Pool</u>. Part 1 of Schedule A asks for information about the <u>CPO</u>. Part 2 of Schedule A asks for information about each individual <u>Pool</u> that the <u>CPO</u> operated during the <u>Reporting Period</u>. <u>CPOs</u> must complete and file a separate Part 2 for each <u>Pool</u> they operated any time during the <u>Reporting Period</u>.

Unless otherwise specified in a particular question, all information provided in this Schedule A should be accurate as of the <u>Reporting Date</u>.

## PART 1 $\cdot$ INFORMATION ABOUT THE CPO

## 1. <u>CPO</u> INFORMATION

Provide the following general information concerning the <u>CPO</u>:

- a. <u>CPO's</u> Name:
- b. CPO's NFA ID#:
- c. Person to contact concerning this Form CPO-PQR:
- d. <u>CPO's</u> chief compliance officer:
- e. Total number of employees of the <u>CPO</u>:
- f. Total number of equity holders of the <u>CPO</u>:
- g. Total number of Pools operated by the CPO:
- h. Telephone number and email for person identified in c. above

## 2. CPO ASSETS UNDER MANAGEMENT

Provide the following information concerning the amount of <u>Assets Under Management</u> by the <u>CPO</u>:

- a. CPO's Total Assets Under Management:
- b. <u>CPO's</u> Total <u>Net Assets Under Management</u>:

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#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Form CPO-PQR Template · Schedule A

## PART 2 · INFORMATION ABOUT THE POOLS OPERATED BY THE CPO

REMINDER: The <u>CPO</u> must complete and file a separate Part 2 for each <u>Pool</u> that the <u>CPO</u> operated during the <u>Reporting Period</u>.

#### 3. POOL INFORMATION

Provide the following general information concerning the Pool:

a. Pool's name: b. Pool's NFA ID#: c. If the Pool is operated by <u>Co-CPOs</u> the name of the other CPOs d. Under the laws of what state or country is the Pool organized: e. On what date does the Pool's fiscal year end: f. Is this Pool a Private Fund? Yes 🗖 No 🗖 g. List the English name of each Foreign Financial Regulatory Authority and the country with which the Pool is registered: Foreign Financial Regulatory Authority Country h. Is this a Master Fund in a Master-Feeder Arrangement? No 🗖 Yes 🗖 If "Yes," provide the name and NFA ID# of each Feeder Fund investing in this Pool: Feeder Fund NFA ID# i. Is this a Feeder Fund in a Master-Feeder Arrangement? No 🗖 Yes 🗖 If "Yes," provide the name and NFA ID# of the Master Fund in which this Pool invests: Master Fund NFA ID# j. If this <u>Pool</u> invests in other <u>Pools</u>, a) what is the maximum number of investee pool tiers? i. What is the value of this Pool's investments in equity of other Pools or private funds?

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4. <u>POOL</u> THIRD PARTY ADMINISTRATORS Provide the following information concerning the <u>Pool's</u> third	d party administrator(s):
a. Does the <u>CPO</u> use third party administrators for the <u>Pool</u>	? Yes 🗆 No 🗖
If "Yes," provide the following information for each third	d party administrator:
i. Name of the administrator:	
ii. <u>NFA</u> ID# of administrator:	
iii. Address of the administrator:	
iv. Telephone number of the administrator:	
v. Starting date of the relationship with the administra	ator:
vi. Services performed by the administrator:	
Preparation of <u>Pool</u> financial statements:	laintenance of the <u>Pool's</u> books and records: $\Box$
Calculation of <u>Pool's</u> performance: $\Box$ C	ther: 🛛
b. What percentage of the <u>Pool's Assets Under Manageme</u> entity, that is independent of the <u>CPO</u> ?	nt is valued by a third party administrator, or similar <b>%</b>
If the number entered is greater than "0," provide the f	ollowing information:
Name(s) of the third party(-ies):	
5. <u>POOL</u> <u>BROKERS</u> Provide the following information concerning the <u>Pool's</u> <u>Bro</u>	
a. Does the <u>CPO</u> use <u>Brokers</u> for the <u>Pool</u> ?	Yes 🗆 No 🗖
If "Yes," provide the following information for each <u>Bro</u>	<u>ker</u> :
i. Name of the <u>Broker</u> :	
ii. <u>NFA</u> ID# of <u>Broker</u> :	
iii. Address of <u>Broker</u>	
iv. Telephone number of the <u>Broker</u> :	
v. Starting date of the relationship with the <u>Broker</u> :	
vi. Services performed by the <u>Broker</u> :	
·	ustodian services for some or all <u>Pool</u> assets:
Prime brokerage services for the <u>Pool</u> : $\Box$ O	ther: 🛛

6. <u>POOL</u> <u>TRADING MANAGERS</u> Provide the following information concerning the <u>Pool's Trading Manager(s)</u>:

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	ne <u>CPO</u> authorized <u>Trading Managers</u> to invest or allocate s gement?	ome or all of the <u>Pool's Ass</u> Yes □	e <u>ts Under</u> No □		
lf "`	Yes," provide the following information for each <u>Trading Mar</u>	nager:			
i.	Name of the <u>Trading Manager</u> :				
ii.	NFA ID# of the <u>Trading Manager</u> :				
iii.	Address of the <u>Trading Manager</u> :				
iv.	Telephone number of the Trading Manager:				
V.	Starting date of the relationship with the Trading Manager:				
vi.	What percentage of the <u>Pool's Assets Under Management</u> invest or allocate?	does the <u>Trading Manager</u>	have authority to		
	<b>USTODIANS</b> ne following information concerning the <u>Pool's</u> custodian(s):				
a. Does	the <u>CPO</u> use custodians to hold some or all of the <u>Pool's A</u>	ssets Under Management?			
		Yes 🗖	No 🗖		
lf "`	Yes," provide the following information for each custodian:				
i.	Name of the custodian:				
ii.	NFA ID# of the custodian:				
iii.	Address of the custodian:				
iv.	Telephone number of the custodian:				
۷.	Starting date of the relationship with the custodian:				
vi.	What percentage of the Pool's Assets Under Management	is held by the custodian?	<u>%</u>		
	8. <u>POOL</u> AUDITOR Provide the following information concerning the <u>Pool's</u> auditor(s):				
a. Does	the <u>CPO</u> have the <u>Pool's</u> financial statements audited?	Yes 🗖	No 🗖		
If "`	res," provide the following information:				
i.	Is the audit conducted in accordance with GAAP?	Yes 🗖	No 🗖		
ii.	Name of the auditing firm:				
iii.	Address of the auditing firm:				
iv.	Telephone number of the auditing firm:				
V.	v. Starting date of the relationship with the auditing firm:				
b. Are th	e <u>Pool's</u> audited financial statements distributed to the <u>Pool</u>	<u>'s</u> participants? Yes □	No 🗆		

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9. <u>POOL</u> MARKETERS Provide the following information concerning the <u>Pool's</u> marketer(s):				
a. Does the <u>CPO</u> use the services of third parties to market participations in the Pool? Yes $\Box$ No $\Box$				
If "Yes," provide the following information for each marketing firm:				
i. Name of the marketing firm:				
ii. Address of the marketing firm:				
iii. Telephone number of the marketing firm:				
iv. Starting date of the relationship with the marketing firm:				
v. Address of any website used by the marketing firm to market participations in the Pool:				
<ul> <li>10. POOL'S STATEMENT OF CHANGES CONCERNING ASSETS UNDER MANAGEMENT Provide the following information concerning the Pool's activity during the Reporting Period. For the purposes of this question:</li> <li>a. The Assets Under Management and Net Asset Value at the beginning of the Reporting Period are considered to be the same as the assets under management and Net Asset Value at the end of the previous Reporting Period, in accordance with Commission Rule 4.25(a)(7)(A).</li> </ul>				
<ul> <li>The additions to the <u>Pool</u> include all additions whether voluntary or involuntary in accordance with Commission Rule 4.25(a)(7)(B).</li> </ul>				
c. The withdrawals and redemptions from the <u>Pool</u> include all withdrawals or redemptions whether voluntary or not, in accordance with Commission Rule 4.25(a)(7)(C).				
d. The Pool's <u>Assets Under Management</u> and <u>Net Asset Value</u> on the <u>Reporting Date</u> must be calculated by adding or subtracting from the <u>Assets Under Management</u> and <u>Net Asset Value</u> at the beginning of the <u>Reporting Period</u> , respectively, any additions, withdrawals, redemptions and net performance, as provided in Commission Rule 4.25(a)(7)(E).				
i. <u>Pool's Assets Under Management</u> at the beginning of the <u>Reporting Period</u> :				
ii. <u>Pool's Net Asset Value</u> at the beginning of the <u>Reporting Period</u> :				
iii. <u>Pool's</u> net income during the <u>Reporting Period</u> :				
iv. Additions to the <u>Pool</u> during the <u>Reporting Period</u> :				
v. Withdrawals and Redemptions from the <u>Pool</u> during the <u>Reporting Period</u> :				
vi. <u>Pool's Assets Under Management</u> on the <u>Reporting Date</u> :				
vii. Pool's Net Asset Value on the Reporting Date:				

viii. <u>Pool's</u> base currency:

## 11. POOL'S MONTHLY RATES OF RETURN

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

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Provide the <u>Pool's</u> monthly rate of return for each month that the <u>Pool</u> has operated. The <u>Pool's</u> monthly rate of return should be calculated in accordance with Commission Rule 4.25(a)(7)(F). Provide the <u>Pool's</u> annual rate of return for the appropriate year in the row marked "Annual."

	2011	2010	2009	2008	2007	2006	2005
Jan. Feb. March April May June July August Sept. Oct. Nov. Dec. ANNUAL							

## 12. POOL SUBSCRIPTIONS AND REDEMPTIONS

Provide the following information concerning subscriptions to and redemptions from the <u>Pool</u> during the <u>Reporting Period</u>.

a. b.		<u>Pool</u> subscriptions by participants during the <u>Reporting Period</u> : <u>Pool</u> redemptions by participants during the <u>Reporting Period</u> :	F	
C.	Are an	ny <u>Pool</u> participants or share classes currently below the <u>Pool's</u> h	high water mark?	
			Yes 🗖	No 🗖
	lf "Yes	s," provide the following information:		
	i.	What is the percentage of participants below the <u>Pool's</u> high w	ater mark as of	the <u>Reporting Date</u> ?
	ii.	What is the weighted average percentage of participants below <u>Reporting Date</u> ?	w the <u>Pool's</u> high	

d. Provide the following information regarding the <u>Pool's</u> restrictions on participant withdrawals and redemptions.

(For Questions iv. and v., please note that the standards for imposing suspensions and restrictions on withdrawals/redemptions may vary among funds. Make a good faith determination of the provisions that would likely be triggered during conditions that you view as significant market stress.)

i. Does the reporting fund provide participants with withdrawal/redemption rights in the ordinary course?

Yes 🗌 No

(If you responded "yes" to Question 12(d)(i), then you must respond to Questions 12(d)(ii)-(v).)

As of the data reporting date, what percentage of the Pool's net asset value, if any:

- ii. May be subjected to a suspension of participant withdrawals/redemptions CPO (this question relates to a CPO's right to suspend and not just whether a suspension is currently effective)
- iii. May be subjected to material restrictions on participant withdrawals/ redemptions (e.g., "gates") CPO

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	(this question relates to a CPO's right to impose a restriction and not just whether a restriction has been imposed)			
iv.	iv. Is subject to a suspension of participant withdrawals/redemptions (this question relates to whether a suspension is currently effective and not just a CPO's right to suspend)			
V.	Is subject to a material restriction on participant withdrawals/redemption's (e.g., a "gate") (this question relates to whether a restriction has been imposed and not just a CPO's right to impose a restriction)			
e. Has the	e <u>Pool</u> imposed a halt or any other material limitation on redemptions during the <u>Reporting Period</u> ?			
	Yes No			
lf "Yes,	If "Yes," provide the following information:			
i.	On what date was the halt or material limitation imposed?			
ii.	If the halt or material limitation has been lifted, on what date was it lifted?			
iii.	What disclosure was provided to participants to notify them that the halt or material limitation was being imposed? What disclosure was provided to participants to notify them that the halt or material limitation was being lifted?			
iv.	On what date(s) was this disclosure provided?			
V.	Briefly explain the halt or material limitation(s) on redemptions and the reason for such halt or material limitation(s):			

## - This Completes Schedule A of Form CPO-PQR -

## INSTRUCTIONS FOR COMPLETING SCHEDULE B

A <u>CPO</u> is only required to complete and file Schedule B of this <u>Form CPO-PQR</u> if at any point during the <u>Reporting</u> <u>Period</u> the <u>CPO</u> qualified as a <u>Mid-Sized CPO</u> or <u>Large CPO</u>.

Schedule B must be completed and filed annually by <u>Mid-Sized CPOs</u>. <u>Mid-Sized CPOs</u> must complete and file a Schedule B within 90 days of the close of each calendar year during which they satisfied the definition of <u>Mid-Sized</u> <u>CPO</u> and operated at least one <u>Pool</u>. A <u>CPO</u> that qualifies as a <u>Mid-Sized CPO</u> at any point during the calendar year must complete and file a separate Schedule B for each <u>Pool</u> that it operated during the calendar year.

Schedule B must be completed and filed quarterly by <u>Large CPOs</u>. <u>Large CPOs</u> must complete and file a Schedule B within 60 days of the close of the most recent <u>Reporting Period</u> during which they satisfied the definition of <u>Large</u> <u>CPO</u> and operated at least one <u>Pool</u>. A <u>CPO</u> that qualifies as a <u>Large CPO</u> at any point during the <u>Reporting Period</u> must complete and file a separate Schedule B for each <u>Pool</u> that it operated during the <u>Reporting Period</u>.

Notwithstanding the above paragraph, certain <u>Mid-Sized CPOs</u> and <u>Large CPOs</u> that are also registered as <u>Investment Advisers</u> with the SEC may be deemed to have satisfied their Schedule B filing requirements by

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

## Form CPO-PQR Template · Schedule A

completing and filing Sections 1.b. and 1.c. of <u>Form PF</u>. Whether a <u>Mid-Sized CPO</u> or <u>Large CPO</u> has satisfied its Schedule B filing requirements will depend upon the type of <u>Pools</u> it operated during the calendar year or <u>Reporting</u> <u>Period</u>, respectively. Refer to the instructions of this <u>Form CPO-PQR</u> to determine whether you are required to complete this Schedule B and, if you are, how frequently you are required to file.

Unless otherwise specified in a particular question, all information provided in this Schedule B should be accurate as of the <u>Reporting Date</u> for all <u>Large CPOs</u> and accurate as of December 31 of each calendar year for all <u>Mid-Sized</u> <u>CPOs</u>.

REMINDER: A <u>CPO</u> that qualified as a <u>Mid-Sized CPO</u> at any point during the calendar year or <u>Large CPO</u> at any point during the <u>Reporting Period</u> must complete and file a separate Schedule B for each <u>Pool</u> that it operated during the calendar year or <u>Reporting Period</u>, respectively, if not filing Form PF with the SEC in lieu thereof.

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Form CPO-PQR Template · Schedule B

## DETAILED INFORMATION ABOUT THE POOLS OPERATED BY MID-SIZED CPOs AND LARGE CPOS

#### 1. <u>POOL</u> INFORMATION

Provide the following general information concerning the Pool:

- a. <u>Pool's</u> name:
- b. <u>Pool's</u> NFA ID#:

c. Does the Pool have a single primary investment strategy or multiple strategies?

□ Single Primary Strategy

□ Multiple Strategies

d. Indicate which of the investment strategies below best describe the *reporting fund's* strategies. For each strategy that you have selected, provide a good faith estimate of the percentage of the *reporting fund's net asset value* represented by that strategy. If, in your view, the *reporting fund's* allocation among strategies is appropriately represented by the percentage of deployed capital, you may also provide that information.

(Select the investment strategies that best describe the reporting fund's strategies, even if the descriptions below do not precisely match your characterization of those strategies; select "other" only if a strategy that the reporting fund uses is significantly different from any of the strategies identified below. You may refer to the reporting fund's use of these strategies as of the data reporting date or throughout the reporting period, but you must report using the same basis in future filings.)

(The strategies listed below are mutually exclusive (i.e., do not report the same assets under multiple strategies). If providing percentages of capital, the total should add up to approximately 100%.)

	% of NAV	% of capital
Strategy	(required)	(optional)
Equity, Market Neutral		
Equity, Long/Short		
Equity, Short Bias		
Equity, Fundamental		
Macro, Active Trading (high frequency trading)		
Macro, Commodity		
Macro, Currency		
Macro, Global Macro		
Relative Value, Fixed Income Asset Backed		
Relative Value, Fixed Income Convertible Arbitrage		
Relative Value, Fixed Income Corporate		
Relative Value, Fixed Income Sovereign		
Relative Value, Volatility		
Event Driven, Activist		

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Event Driven, Distressed/Restructuring			
Event Driven, Risk Arbitrage/Merger Arbitrage			
Event Driven, Equity Special Situations			
Event Driven, Private Issue/Reg D			
Credit, Fundamental			
Managed Futures/CTA			
Quantitative			
Investment in other funds			
Other:			

e. Provide the approximate percentage of the <u>Pool's</u> portfolio that is managed using quantitative trading algorithms or quantitative techniques to select investments. Do not include the use of algorithms used solely for trade execution:
 0%

□ 76-99%

□ 100%

0	%	)
4	4	~

□ 1-10%

□ 11-25%

□ 26-50%

- f. Provide the following information concerning the <u>Pool's</u> participant concentration. Beneficial owners of <u>Pool</u> participations that are <u>Affiliated Entities</u> should be treated as a single participant:
  - i. Total number of participants in the Pool:
  - ii. Percentage of the Pool that is beneficially owned by the five largest participants:
- g. During the reporting period, approximately what percentage of the Pool's net asset value was managed using high-frequency trading strategies?

(In your response, please do not include strategies using algorithms solely for trade execution. This question concerns strategies that are substantially computer-driven, where decisions to place bids or offers, and to buy or sell, are primarily based on algorithmic responses to intraday price action in equities, futures and options, and where the total number of shares or contracts traded throughout the day is generally significantly larger than the net change in position from one day to the next.)

□ less than 10%

□ 26-50%

□ 76-99%

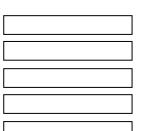
□ 0%

- □ 10-25%
- □ 51-75%
- □ 100% or more

## 2. POOL BORROWINGS AND TYPES OF CREDITORS

Provide the following information concerning the <u>Pool's</u> borrowings and types of creditors. Include all <u>Secured</u> <u>Borrowings</u> and <u>Unsecured Borrowings</u>, but not synthetic borrowings. The percentages entered below for questions 2.b., 2.c., 2.d. and 2.e. should total 100%:

- a. Total Borrowings (dollar amount):
- b. Percentage borrowed from U.S. Financial Institutions:
- c. Percentage borrowed from non-U.S. Financial Institutions:



#### Form CPO-PQR Template · Schedule B

- d. Percentage borrowed from U.S. creditors that are not Financial Institutions:
- e. Percentage borrowed from non-U.S. creditors that are not Financial Institutions:

## 3. POOL COUNTERPARTY CREDIT EXPOSURE

Provide the following information about the <u>Pool's</u> counterparty credit exposure. Do not include <u>CCPs</u> as counterparties and aggregate all <u>Affiliated Entities</u> as a single group for purposes of this question.

Your responses should take into account: (i) mark-to-market gains and losses on derivatives; (ii) margin posted to the counterparty (for subparagraph 3.b.) or margin posted by the counterparty (for subparagraph 3.c.); and (iii) any loans or loan commitments. Your responses should not take into account: (i) assets that the counterparty is holding in custody on your behalf; (ii) derivative transactions that have been executed but not settled; (iii) margin held in a customer omnibus account at a <u>CCP</u>; or (iv) holdings of debt or equity securities issued by the counterparty.

- a. Provide the <u>Pool's</u> aggregate net counterparty credit exposure, measured in dollars:
- b. Identify the five counterparties to which the *reporting fund* has the greatest mark-to-market net counterparty credit exposure, measured as a percentage of the *reporting fund's net asset value*.

(For purposes of this question, you should treat affiliated entities as a single group to the extent exposures may be contractually or legally set-off or netted across those entities and/or one affiliate guarantees or may otherwise be obligated to satisfy the obligations of another. CCPs should not be regarded as counterparties for purposes of this question.) (In your response, you should take into account: (i) mark-to-market gains and losses on derivatives; and (ii) any loans or loan commitments.)

(However, you should not take into account: (i) margin posted by the counterparty; or (ii) holdings of debt or equity securities issued by the counterparty.)

Exposure (% of

	Legal name of the counterparty (or, if multiple affiliated entities, counterparties)	Indicate below if the counterparty is affiliated with a major financial institution	reporting fund's net asset value)
i.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
iii.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
V.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
vii.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
ix.		[repeat drop-down list of	

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creditor/counterparty names]
Other:
[Not applicable]

c. Identify the five counterparties that have the greatest mark-to-market net counterparty credit exposure to the *reporting fund*, measured in U.S. dollars.

(For purposes of this question, you should treat affiliated entities as a single group to the extent exposures may be contractually or legally set-off or netted across those entities and/or one affiliate guarantees or may otherwise be obligated to satisfy the obligations of another. CCPs should not be regarded as counterparties for purposes of this question.)

(In your response, you should take into account: (i) mark-to-market gains and losses on derivatives; and (ii) any loans or loan commitments.)

(However, you should not take into account: (i) margin posted to the counterparty; or (ii) holdings of debt or equity securities issued by the counterparty.)

	Legal name of the counterparty (or, if multiple affiliated entities, counterparties)	Indicate below if the counterparty is affiliated with a major financial institution	Exposure (in U.S. dollars)
i.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
iii.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
v.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
/ii.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	
ix.		[repeat drop-down list of creditor/counterparty names]	
		Other:	
		[Not applicable]	

d. Identify the three types of unregulated entities to which the <u>Pool</u> has the greatest net counterparty exposure, measured as a percentage of the <u>Pool's Net Asset Value</u>:



Securitized Asset Fund	%
Other Private Fund	%
Sovereign Wealth Fund	%
Other:	

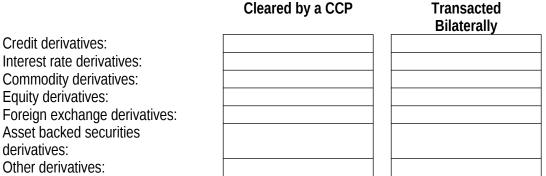
## 4. POOL TRADING AND CLEARING MECHANISMS

## Form CPO-PQR Template · Schedule B

Provide the following information concerning the <u>Pool's</u> use of trading and clearing mechanisms. For purposes of this question: (i) a trade includes any transaction, irrespective of whether entered into on a bilateral basis, on exchange, or through a trading facility or other system, and (ii) transactions for which margin is held in a customer omnibus account at a <u>CCP</u> should be considered cleared by a <u>CCP</u>.

## **Trading and Clearing of Derivatives**

- a. For each of the following types of derivatives that are traded by the <u>Pool</u>, estimate the percentage (in terms of notional value) of the <u>Pool's</u> activity that is traded on a regulated exchange as opposed to over-the-counter. The percentages entered for each row should total 100%:
- b. For each of the following types derivatives that are traded by the <u>Pool</u>, estimate the percentage (in terms of notional value) of the <u>Pool's</u> activity that is cleared by a <u>CCP</u> as opposed to being transacted bilaterally (not cleared by a <u>CCP</u>). The percentages entered for each row should total 100%:



c. For each of the following types securities that are traded by the <u>Pool</u>, estimate the percentage (in terms of market value) of the <u>Pool's</u> activity that is traded on a regulated exchange as opposed to over-the-counter. The percentages entered for each row should total 100%:

	Traded on a Regulated Exchange	Traded Over-the- Counter
Equity securities:		
Debt securities:		

d. For each of the following types securities that are traded by the <u>Pool</u>, estimate the percentage (in terms of market value) of the <u>Pool's</u> activity that is cleared by a <u>CCP</u> as opposed to being transacted bilaterally (not cleared by a <u>CCP</u>). The percentages entered for each row should total 100%:

	Cleared by a CCP	Transacted Bilaterally
Equity securities:		

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Debt securities:				

#### **Clearing of Repos**

e. For the repo trades into which the <u>Pool</u> has entered, estimate the percentages (in terms of market value) of the <u>Pool's</u> repo trades that are cleared by a <u>CCP</u>, that are transacted bilaterally (not cleared by a <u>CCP</u>) and that constitute a tri-party repo. Tri-party repo is any repo where the collateral is held at a custodian (not a CCP) that acts as a third party agent to both repo buyer and the repo seller. The percentages entered should total 100%: **Cleared by a CCP Transacted Tri-Party Repo** 

Dono	 Bilaterally	
Repo		

## 5. VALUE OF THE POOL'S AGGREGATED DERIVATIVE POSITIONS

Provide the aggregate value of all derivative positions of the <u>Pool</u>. The value of any derivative should be its total gross notional value, except that the value of an option should be its delta adjusted notional value. Do not net long and short positions.

Aggregate value of derivative positions:

## 6. POOL SCHEDULE OF INVESTMENTS

Provide the <u>Pool's</u> investments in each of the subcategories listed under the following seven headings: (1) Cash; (2) Equities; (3) Alternative Investments; (4) Fixed Income; (5) Derivatives; (6) Options; and (7) Funds. First, determine how the <u>Pool's</u> investments should be allocated among each of these seven categories. Once you have determined how the <u>Pool's</u> investments should be allocated, enter the dollar value of the <u>Pool's</u> total investment in each applicable category on the top, boldfaced line. For example, under the "Cash" heading, the <u>Pool's</u> total investment should be listed on the line reading "Total Cash." After the top, boldfaced line is completed, proceed to the subcategories. For each subcategory, determine whether the <u>Pool</u> has investments that equal or exceed 5% of the <u>Pool's Net Asset Value</u>. If so, provide the dollar value of each such investment in the appropriate subcategory. If the dollar value of any investment in a subcategory equals or exceeds 5% of the <u>Pool's Net Asset Value</u>, you must itemize the investments in that subcategory.

CASH Total Cas	h		
At Carı	rying Broker		
At Ban	k		
EQUITIES Total Listed B	Equities	Long	<u>Short</u>
Stocks			
a.	Energy and Utilities		
b.	Technology		
С.	Media		
d.	Telecommunication		
e.	Healthcare		
f.	Consumer Services		
g.	Business Services		

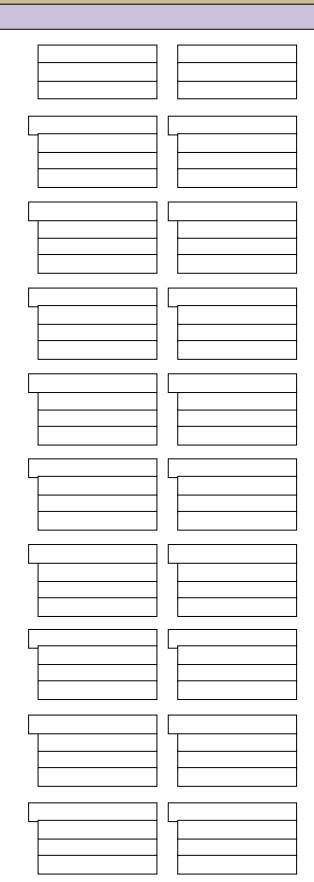
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h. Issued by <u>Financial Institutions</u>				
i. Consumer Goods				
j. Industrial Materials				
Exchange Traded Funds				
American Deposit Receipts				
Other				
Total Unlisted Equities				
Unlisted Equities Issued by Financial Institutions				
ALTERNATIVE INVESTMENTS	Long	<u>Short</u>		
Total Alternative Investments				
Real Estate				
a. Commercial				
b. Residential				
Private Equity				
Venture Capital				
Forex				
Spot				
a. Total Metals		1		
i. Gold				
b. Total Energy				
i. Crude oil				
ii. Natural gas				
iii. Power				
c. Other				
Loans to Affiliates				
Promissory Notes				
Physicals				
a. Total Metals				
i. Gold				
b. Agriculture				
c. Total Energy				
i. Crude oil				
ii. Natural gas				

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	iii. P	ower		
Other				
FIXED INCOM	E		Long	<u>Short</u>
Total Fixed In	come			
Notes,	Bonds a	and Bills		
a.	Corpor	rate		
	i.	Investment grade		
	ii.	Non-investment grade		
b.	Munici	pal		
C.	Goverr	nment		
	i.	U.S. Treasury securities		
	ii.	Agency securities		
	iii.	Foreign (G10 countries)		
	iv.	Foreign (all other)		
d.	Gov't S	Sponsored		
e.	Conve	rtible		
	i.	Investment grade		
	ii.	Non-investment grade		
Certific	ates of I	-		
	U.S.			
b.	Foreig	n		
	•	Securities		
a.		age Backed Securities		
	i.	Commercial Securitizations		
		A. Senior or higher		
		B. Mezzanine C. Junior/Equity		
	ii.	Commercial Resecuritizations A. Senior or higher		
		B. Mezzanine		
		C. Junior/Equity		
	iii.	Residential Securitizations		
		<ul> <li>A. Senior or higher</li> <li>B. Mezzanine</li> </ul>		
		C. Junior/Equity		

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Form CPO-PQR Template · Schedule B

- iv. Residential Resecuritizations
  - A. Senior or higher
  - B. Mezzanine
  - C. Junior/Equity
- v. Agency Securitizations
  - A. Senior or higher
  - B. Mezzanine
  - C. Junior/Equity
- vi. Agency Resecuritizations
  - A. Senior or higher
  - B. Mezzanine
  - C. Junior/Equity
- b. CDO Securitizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity
- c. CDO Resecuritizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity
- d. CLOs Securitizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity
- e. CLO Resecuritizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity
- f. Credit Card Securitizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity
- g. Credit Card Resecuritizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity
- h. Auto-Loan Securitizations
  - i. Senior or higher
  - ii. Mezzanine
  - iii. Junior/Equity



## 

DERIVATIVES Total Derivatives	Positive OTE Negative OTE	
Futures		
a. Indices		=
i. Equity		
ii. Commodity		$\neg$
b. Metals		
i. Gold		$\neg$
c. Agriculture		
d. Energy		
i. Crude oil		
ii. Natural gas		
iii. Power		
e. Interest Rate		
f. Currency		
g. Related to Financial Institutions		
h. Other		
Forwards		
Swaps		
a. Interest Rate Swap		
b. Equity/Index Swap		
c. Dividend Swap		
d. Currency Swap		
e. Variance Swap		
f. Credit Default Swap		
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#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

## Form CPO-PQR Template · Schedule B

## i. Single name CDS

A. Related to Financial Institutions

- ii. Index CDS
- iii. Exotic CDS
- g. OTC Swap
  - i. Related to Financial Institutions
- h. Total Return Swap
- i. Other

## OPTIONS

## **Total Options**

Futures

- a. Indices
  - i. Equity
  - ii. Commodity
- b. Metals
  - i. Gold
- c. Agriculture
- d. Energy
  - i. Crude oil
  - ii. Natural Gas
  - iii. Power
- e. Interest Rate
- f. Currency
- g. Related to Financial Institutions
- h. Other

Stocks

a. Related to Financial Institutions

Customized/OTC

Physicals

- a. Metals
  - i. Gold
- b. Agriculture
- c. Currency

## Long Option Value

## **Short Option Value**

<b>`</b>	
	1

## 

## FUNDS

Long	

Total Funds	
Mutual Fund a. U.S.	
b. Foreign	
NFA Listed Fund	
Hedge Fund	
Equity Fund	
Money Market Fund	
Private Equity Fund	
REIT	
Other Private funds	
Funds and accounts other than <u>private funds</u> (i.e., the remainder of your assets under management)	

## ITEMIZATION

a. If the dollar value of any investment in any subcategory under the heading "Equities," "Alternative Investments" or "Fixed Income" equals or exceeds 5% of the <u>Pool's Net Asset Value</u>, itemize the investment(s) in the table below.

Subheading	Description of Investment	Long/ Short	Cost	Fair Value	Year-to-Date Gain (Loss)
					• •

b. If the dollar value of any investment in any subcategory under the heading "Derivatives" or "Options" equals or exceeds 5% of the <u>Pool's Net Asset Value</u>, itemize the investment(s) in the table below.

Subheading	Description of	Long/	OTE	Counterparty	Year-to-Date
	Investment	Short			Gain (Loss)

c. If the dollar value of any investment in any subcategory under the heading "Funds" equals or exceeds 5% of the <u>Pool's Net Asset Value</u>, itemize the investment(s) in the table below.

Subheading	Fund Name	Fund Type	Fair Value	Year-to-Date
------------	-----------	-----------	------------	--------------

CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule B

Gain (Loss)

#### 7. MISCELLANEOUS

In the space below, provide explanations to clarify any assumptions that you made in responding to any question in Schedule B of this Form CPO-PQR. Assumptions must be in addition to, or reasonably follow from, any instructions or other guidance provided in, or in connection with, Schedule B of this Form CPO-PQR. If you are aware of any instructions or other guidance that may require a different assumption, provide a citation and explain why that assumption is not appropriate for this purpose.

<b>Question Number</b>	Explanation

- This Completes Schedule B of Form CPO-PQR -

#### Form CPO-PQR Template · Schedule C

#### INSTRUCTIONS FOR COMPLETING SCHEDULE C

A <u>CPO</u> is only required to complete and file Schedule C of this <u>Form CPO-PQR</u> if at any point during the <u>Reporting</u> <u>Period</u> the <u>CPO</u> qualified as a <u>Large CPO</u>.

Schedule C must be completed and filed only by <u>Large CPOs</u>. <u>Large CPOs</u> must complete and file a Schedule C for every <u>Reporting Period</u> during which they satisfy the definition of a <u>Large CPO</u> and operate at least one <u>Pool</u>. A <u>CPO</u> that qualifies as a <u>Large CPO</u> at any point during the <u>Reporting Period</u> must complete and file a separate Part 2 of Schedule C for each <u>Large Pool</u> that it operated during the <u>Reporting Period</u>.

#### No Schedule C Filing Requirements

Any <u>Large CPO</u> that is: (i) registered with the <u>SEC</u> as an <u>Investment Adviser</u>; and (ii) operated only <u>Pools</u> that satisfy the definition of <u>Private Fund</u> during the <u>Reporting Period</u> will be deemed to have satisfied its Schedule C filing requirements by completing and filing Section 2 of <u>Form PF</u> for the <u>Reporting Period</u> in question.

#### Limited Schedule C Filing Requirements

However, any Large CPO that is: (i) registered with the <u>SEC</u> as an <u>Investment Adviser</u>; and (ii) operated any <u>Pools</u> that do not satisfy the definition of <u>Private Fund</u> during the <u>Reporting</u> Period may choose to file the relevant sections of <u>Form PF</u> with respect to those funds. For <u>Large CPOs</u> that do not choose to file <u>Form PF</u> for <u>Pools</u> that are not <u>Private Funds</u>, Part 1 of Schedule C will need to be completed with respect to all <u>Pools</u> that they operated during the <u>Reporting Period</u> that did not satisfy the definition of <u>Private Fund</u>, and Part 2 of Schedule C will need to be completed with respect to each <u>Large Pools</u> that they operated during the <u>Reporting Period</u> that did not satisfy the definition of <u>Private Fund</u>. These Schedule C filings will need to be completed in addition to the <u>Large CPO's Form</u> <u>PF</u> filing requirements.

Refer to the instructions of this Form CPO-PQR to determine whether you are required to complete this Schedule C.

Part 1 of Schedule C asks the <u>Large CPO</u> to provide information on the aggregated investments of all <u>Pools</u> that are not <u>Private Funds</u> that were operated by the <u>Large CPO</u> during the most recent <u>Reporting Period</u>. Any <u>Large CPO</u> who has completed and filed Section 2 of <u>Form PF</u> for the <u>Private Funds</u> it operated during this <u>Reporting Period</u>, and who is choosing to file Part 1 of Schedule C for <u>Pools</u> that are not <u>Private Funds</u>, must answer Part 1 only with respect to the <u>Pools</u> that are not <u>Private Funds</u>.

Part 2 of Schedule C asks the Large CPO to provide certain risk metrics for each Large Pool that is not a Private Fund that was operated by the Large CPO during the most recent Reporting Period. A Large CPO must complete and file a separate Part 2 of Schedule C for each Large Pool that is not a Private Fund that the Large CPO operated during the most recent Reporting Period. Any Large CPO who has completed and filed Section 2 of the SEC's Form PE for the Private Funds it operated during this Reporting Period, and who is choosing to file Part 2 of Schedule C for Pools that are not Private Funds, should be sure to complete and file a Part 2 only for its Large Pools that are not Private Funds.

Unless otherwise specified in a particular question, all information provided in this Schedule C should be accurate as of the <u>Reporting Date</u>.

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule C

## 1. GEOGRAPHICAL BREAKDOWN OF POOLS' INVESTMENTS

a. Provide a geographical breakdown of the investments (by percentage of aggregated Assets Under Management) of all Pools that are not Private Funds that were operated by the Large CPO during the most recent Reporting Period. Except for foreign exchange derivatives, investments should be allocated by the jurisdiction of the organization of the issuer or counterparty. For foreign exchange derivatives, investments should be allocated by the country to whose currency the Pool has exposure through the derivative. The percentages entered below should total 100%.

(i)	Africa	
(ii)	Asia and Pacific (other than the Middle East)	-
(iii)	Europe (EEA)	
(iv)	Europe (other than EEA)	
(V)	Middle East	
(vi)	North America	
(vii)	South America	
(viii)	Supranational	•

b. Provide the value of investments in the following countries held by the *hedge funds* that you advise (by percentage of the total *net asset value* of these *hedge funds*).

(Exclude interest rate derivatives and foreign exchange derivatives from both the numerator and denominator.)

	Country	% of NAV
(i)	Brazil	
(ii)	China (including Hong Kong)	
(iii)	India	
(iv)	Japan	
(v)	Russia	
(vi)	United States	

## 2. TURNOVER RATE OF AGGREGATE PORTFOLIO OF POOLS

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Form CPO-PQR Template · Schedule C

Provide the turnover rate by volume for the aggregate portfolio of all <u>Pools</u> that are not <u>Private Funds</u> and that were operated by the <u>Large CPO</u> during the most recent <u>Reporting Period</u>. The turnover rate should be calculated as follows:

Divide the lesser of the amounts of the <u>Pools'</u> purchases or sales of assets for the month by the average of the value of the <u>Pools'</u> assets during the month. Calculate the "monthly average" by totaling the values of <u>Pools'</u> assets as of the beginning and the end of the month and dividing that sum by two.

- i. Do not net long and short positions. However, in relation to derivatives, packages such as call-spreads may be treated as a single position (rather than as a long position and a short position).
- ii. The value of any derivative should be its total gross notional value, except that the value of an option should be its delta adjusted notional value
- iii. "Purchases" include any cash paid upon the conversion of one asset into another and the costs of rights or warrants.
- iv. "Sales" include net proceeds of the sale of rights and warrants and net proceeds of assets that have been called or for which payment has been made through redemption or maturity.
- v. Include proceeds from a short sale in the amount of sales of assets in the relevant subcategory during the month. Include the costs of covering a short sale in the amount of purchases in the relevant subcategory during the month.
- vi. Include premiums paid to purchase options and premiums received from the sale of options in the amount of purchases during the month.

	First Month	Second Month	Third Month
Open Positions:			

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule C

## PART 2 · INFORMATION ABOUT THE LARGE POOLS OF LARGE CPOS

REMINDER: A CPO that qualified as a Large CPO at any point during the most recent Reporting Period must complete and file a separate Part 2 of Schedule C for each Pool that is not a Private Fund that the Large CPO operated during the most recent Reporting Period.

#### **1. LARGE POOL INFORMATION**

Provide the following general information concerning the Large Pool:

a. <u>Large Pool's</u> name:			
b. <u>Large Pool's</u> NFA ID#:			
c. If the Pool has a <u>Co-CPO,</u> or <u>Co</u>	-CPOs provide the name of	FCPO reporting the Pool's in	formation:
d. Total unencumbered cash held l	by the <u>Large Pool</u> at the clos	se of each month during the	Reporting Period:
	First Month	Second Month	Third Month
Unencumbered	First Month	Second Month	Third Month
Cash:			
Cash: e. Total number of open positions (			
Cash:			
Cash: e. Total number of open positions (	(approximate) held by the La		

## 2. LIQUIDITY OF LARGE POOL'S PORTFOLIO

Provide the percentage of the Large Pool's portfolio (excluding cash and cash equivalents) that may be liquidated within each of the periods specified below. Each asset should be assigned only to one period and such assignment should be based on the shortest period during which such asset could reasonably be liquidated. Make good faith assumptions for liquidity based on market conditions during the most recent Reporting Period. Assume no "fire-sale" discounting. If certain positions are important contingent parts of the same trade, then all contingent parts of the trade should be listed in the same period as the least liquid part.

## Percentage of Portfolio

Capable of Liquidation in:

1 day or less:	
2 days – 7 days:	
8 days – 30 days:	
31 days – 90 days:	
91 days – 180 days:	
181 days – 365 days:	
longer than 365 days:	

## 3. LARGE POOL COUNTERPARTY CREDIT EXPOSURE

#### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Form CPO-PQR Template · Schedule C

Provide the following information about the <u>Pool's</u> counterparty credit exposure. Do not include <u>CCPs</u> as counterparties and aggregate all <u>Affiliated Entities</u> as a single group for purposes of this question. For purposes of this question, include as collateral any assets purchased in connection with a reverse repo and any collateral that the counterparty has posted to the <u>Large Pool</u> under an arrangement pursuant to which the <u>Large Pool</u> has loaned securities to the counterparty. If you do not separate collateral into initial margin/independent amount and variation margin amounts, or a trade does not require posting of variation margin, then include all of the collateral in initial margin/independent amount.

- a. For each of the five counterparties identified in question 3.b. of Schedule B, provide the following information regarding the collateral and other credit support that the counterparty has posted to the <u>Large Pool</u>.
  - i. Provide the following values of the collateral posted to the Large Pool:

	Initial Margin/ Independent Amounts	Variation Margin
Value of collateral posted in the form of cash and cash equivalents:		
Value of collateral posted in the form of securities (other than cash /cash equivalents):		
Value of all other collateral posted:		

ii. Provide the following percentages of margin amounts that have been rehypothecated or may be rehypothecated by the <u>Large Pool</u>:

	May be Rehypothecated	The <u>Large Pool</u> has Rehypothecated
Percentage of initial margin/independent amounts that: Percentage of variation margin that:		

iii. Provide the face amount of letters of credit or other similar third party credit support posted to the Large Pool:

- b. For each of the five counterparties identified in question 3.c. of Schedule B, provide the following information regarding the collateral and other credit support that the <u>Large Pool</u> has posted to the counterparty.
  - i. Provide the following values of the collateral posted by the <u>Large Pool</u> to the counterparty:

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule C

	Initial Margin/ Independent Amounts	Variation Margin
Value of collateral posted in the form of cash and cash equivalents:		
Value of collateral posted in the form of securities (other than cash /cash equivalents):		
Value of all other collateral posted:		

ii. Provide the following percentages of margin amounts posted by the <u>Large Pool</u> that have been rehypothecated or may be rehypothecated by the counterparty:

	May be
	Rehypothecated
Percentage of initial margin/independent	
amounts that:	
Percentage of variation margin that:	

- iii. Provide the face amount of letters of credit or other similar third party credit support posted by the <u>Large</u> <u>Pool</u> to the counterparty:
- c. Did the pool clear any transactions through a CCP during the reporting period?

□ Yes

#### □ No

## 4. LARGE POOL RISK METRICS

Provide the following information concerning the Large Pool's risk metrics during the Reporting Period:

a. Did the Large CPO regularly calculate the VaR of the Large Pool during the Reporting Period:

□ Yes

🗆 No

- b. If "Yes," provide the following information concerning the <u>VaR</u> calculation(s). If you regularly calculate the <u>VaR</u> of the <u>Large Pool</u> using multiple combinations of confidence interval, horizon and historical observation period, complete a separate question 4.b. of Part 2 of Schedule C for each such combination.
  - i. What confidence interval was used (e.g. 1 alpha) (as a percentage):
  - ii. What time horizon was used (in number of days):
- iii. What weighting method was used:  $\Box$  None

C Other	

Exponential

If "exponential" provide the weighting factor used:

- iv. What method was used to calculate VaR:
  - □ Historical simulation
  - □ Parametric

CFTC AND	CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS						
Form CPO	-PQR Template · Schedule C						
	<ul> <li>Monte Carlo simulation</li> <li>Other</li> </ul>						
۷.	Historical look-back period used, if applicable:						
vi.	Under the above parameters, what was VaR for the Large Pool for each of the three months of the						
	Reporting Period, stated as a percent of Net Asset Value:						
fund's	First Month       Second Month       Third Month         VaR:						
fund's	VaR:						

d. For each of the market factors specified below, determine the effect that each specified change would have on the <u>Large Pool's</u> portfolio and provide the results, stated as a percent of <u>Net Asset Value</u>.

You may omit a response to any of the specified market factors that the <u>Large CPO</u> does not regularly consider (whether in formal testing or otherwise) in the <u>Large Pool's</u> risk management. If you omit any market factor, check the box in the first column indicating that this market factor is "Not Relevant" to the <u>Large Pool's</u> portfolio.

For each specified change in market factor, separate the effect on the <u>Large Pool's</u> portfolio into long and short components where (i) the long component represents the aggregate result of all positions with a positive change in valuation under a specified change and (ii) the short component represents the aggregate result of all positions with a positions with a negative change in valuation under a specified change.

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

#### Form CPO-PQR Template · Schedule C

Observe the following regarding the market factors specified below:

- i. A change in "equity prices" means that the prices of all equities move up or down by the specified change, without regard to whether the equities are listed on any exchange or included in any index.
- ii. "Risk free interest rates" means rates of interest accruing on sovereign bonds issued by governments having the highest credit quality, such as U.S. Treasury bonds.
- iii. A change in "credit spreads" means that all credit spreads against risk free interest rates change by the specified amount.
- iv. A change in "currency rates" means that the value of all currencies move up or down by the specified amount.
- v. A change in "commodity prices" means that the prices of all physical commodities move up or down by the specified amount.
- vi. A change in "implied options volatilities" means the implied volatilities of all the options that the <u>Large Pool</u> holds increase or decrease by the specified number of percentage points; and
- vii. A change in "default rates" means that the rate at which debtors on all instruments of the specified type increases or decreases by the specified number of percentage points.

Not Relevan t	Relevant/not formally tested	Market Factor: Equity Prices	Effect on long component of portfolio (as % of NAV)	Effect on short component of portfolio (as % of NAV)
		Equity prices increase 5%		
		Equity prices decrease 5%		
		Equity prices increase		
		20%		
		Equity prices decrease		
		20%		

Not	Relevant/not	Market Factor:	Effect on long	Effect on short
Relevan	formally	Risk Free Interest Rates	component of	component of
t	tested		portfolio (as % of	portfolio (as % of

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

## Form CPO-PQR Template · Schedule C

			NAV)	NAV)
		Risk free interest rates		
		increase		
		25 bp		
		Risk free interest rates		
		decrease 25 bp		
		Risk free interest rates		
		increase 75 bp		
		Risk free interest rates		
		decrease 75 bp		
Not Relevan t	Relevant/not formally tested	Market Factor: Credit Spreads	Effect on long component of portfolio (as % of NAV)	Effect on short component of portfolio (as % of NAV)
			-	
		Credit spreads increase 50bp		
		Credit spreads decrease 50 bp		
		Credit spreads increase 250 bp		
		Credit spreads decrease 250 bp		
Not Relevant	Relevant/not formally	Market Factor: Currency Rates	Effect on long component of	Effect on short component of
	tested		portfolio (as % of NAV)	portfolio (as % of NAV)
		Currency rates increase 5%		
		Currency rates decrease 5%		
		Currence a retain in area and		

5%	
Currency rates increase	
20%	
Currency rates decrease	
20%	

Not Relevan t	Relevant/not formally tested	Market Factor: Commodity Prices	Effect on long component of portfolio (as % of NAV)	Effect on short component of portfolio (as % of NAV)
		Commodity prices		

CFTC AND	CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS							
Form CPO-	Form CPO-PQR Template · Schedule C							
			increase 10% Commodity prices decrease 10% Commodity prices increase 40% Commodity prices					
	Not Relevan t	Relevant/not formally tested	decrease 40% Market Factor: Options Implied Volatility	Effect on long component of portfolio (as % of NAV)	Effect on short component of portfolio (as % of NAV)			
			Implied volatilities increase 4 percentage points Implied volatilities decrease 4 percentage points Implied volatilities increase 10 percentage points Implied volatilities decrease 10 percentage points					

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule C

Not Relevan t	Relevant/not formally tested	Market Factor: Default Rates for ABS	Effect on long component of portfolio (as % of NAV)	Effect on short component of portfolio (as % of NAV)
		Default rates increase 1 percentage point Default rates decrease 1 percentage point Default rates increase 5 percentage points Default rates decrease 5 percentage points		
Not Relevan	Relevant/not	Market Factor:	Effect on long	Effect on short

Relevan	formally tested	Default Rates for Corporate Bonds	component of portfolio (as % of NAV)	component of portfolio (as % of NAV)
		Default rates increase 1 percentage point Default rates decrease 1 percentage point Default rates increase 5 percentage points Default rates decrease 5 percentage points		

## 5. LARGE POOL BORROWING INFORMATION

Provide the following information concerning the value of the <u>Large Pool's</u> borrowings for each of the three months of the <u>Reporting Period</u>, types of creditors and the collateral posted to secure borrowings. For the purposes of this question, "borrowings" includes both <u>Secured Borrowings</u> and <u>Unsecured Borrowings</u>. For each type of borrowing specified below, provide the dollar amount of the <u>Large Pool's</u> borrowings and the percentage borrowed from each of the specified types of creditors. The percentages entered in each month's column should total 100%.

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

## Form CPO-PQR Template · Schedule C

## a. Unsecured Borrowing:

First Month	Second Month	Third Month

## b. Secured Borrowing:

Classify <u>Secured Borrowings</u> according to the legal agreement governing the borrowing (e.g., Global Master Repurchase Agreement for repos and Prime Brokerage Agreement for prime brokerage). Please note that for repo borrowings, the amount should be the net amount of cash borrowed (after taking into account any initial margin/independent amount, "haircuts" and repayments). Positions under a Global Master Repurchase Agreement should not be netted.

i. Via prime brokerage:

	First Month	Second Month	Third Month
Total Dollar amount:			
Value of collateral posted in the form of cash and cash equivalents Value of collateral posted in the form of securities (not cash/cash equivalents)			
Value of other collateral posted			
Face amount of letters of credit (or similar third party credit support) posted			
Percentage of posted collateral that may be rehypothecated			
Percentage borrowed from <u>U.S. Financial</u> Institutions			
Percentage borrowed from <u>Non-U.S.</u> <u>Financial Institutions</u>			
Percentage borrowed from creditors that are not <u>Financial Institutions</u>			

ii. Via repo. For the questions concerning collateral via repo, include as collateral any assets sold in connection with the repo as well as any variation margin.

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## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule C

QR Template - Schedule C		
Value of collateral posted in the form of cash and cash equivalents		
Value of collateral posted in the form of		
securities (not cash/cash equivalents)		
Value of other collateral posted		
Face amount of letters of credit (or similar		
third party credit support) posted		
Percentage of posted collateral that may		
be rehypothecated		
Percentage borrowed from U.S. Financial		
Institutions		
Percentage borrowed from Non-U.S.		
Financial Institutions		
Percentage borrowed from creditors that		
are not Financial Institutions		
are not interestal methodione		

iii. Other <u>Secured Borrowings</u>:

## Total dollar amount:

Value of collateral posted in the form of				
cash and cash equivalents				
Value of collateral posted in the form of				
securities (not cash/cash equivalents)				
Value of other collateral posted				
•				
Face amount of letters of credit (or similar				
third party credit support) posted				
Percentage of posted collateral that may				
be rehypothecated				
Percentage borrowed from U.S. Financial				
Institutions				
Percentage borrowed from Non-U.S.				
Financial Institutions				
Percentage borrowed from creditors that				
are not Financial Institutions				
	_	1	1	

First Month

Second Month

Third Month

## 6. LARGE POOL DERIVATIVE POSITIONS AND POSTED COLLATERAL

Provide the following information concerning the value of the <u>Large Pool's</u> derivative positions and the collateral posted to secure those positions for each of the three months of the <u>Reporting Period</u>. For the value of any derivative, except options, should be its total gross notional value. The value of an option should be its delta adjusted notional value. Do not net long and short positions.

	First Month	Second Month	Third Month
Aggregate value of all derivative positions:			

### CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

Form CPO-PQR Template · Schedule C
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Value of collateral posted in the form of		
cash and cash equivalents		
As initial margin/independent		
amounts:		
As variation margin:		
Value of collateral posted in the form of		
securities (not cash/cash equivalents)		
As initial margin/independent		
amounts:		
As variation margin:		
<u> </u>		
Value of other collateral posted		
As initial margin/independent		
amounts:		
As variation margin:		
Face amount of letters of credit (or similar		
third party credit support) posted		
Percentage of initial margin/independent		
amounts that may be rehypothecated:		
Percentage of variation margin that may		

## 7. LARGE POOL FINANCING LIQUIDITY

be rehypothecated:

Provide the following information concerning the Large Pool's financing liquidity:

- a. Provide the aggregate dollar amount of cash financing drawn by or available to the Large Pool, including all drawn and undrawn, committed and uncommitted lines of credit as well as any term finand
- b. Below, enter the percentage of cash financing (as stated in response to guestion 7.a.) that is contractually committed to the Large Pool by its creditor(s) for the specified periods of time. Amounts of financing should be divided among the specified periods of time in accordance with the longest period for which the creditor is contractually committed to providing such financing. For purposes of this question, if a creditor (or syndicate or administrative/collateral agent) is permitted to unilaterally vary the economic terms of the financing or to revalue posted collateral in its own discretion and demand additional collateral, then the line of credit should be deemed uncommitted.

	Financing:
1 day or less:	
2 days – 7 days:	
8 days – 30 days:	
31 days – 90 days:	
91 days – 180 days:	
181 days – 364 days:	
365 days or longer:	

# Percentage of Total

## 8. LARGE POOL PARTICIPANT INFORMATION

Provide the following information concerning the Large Pool's participants:

a. As of the Reporting Date, what percentage of the Large Pool's Net Asset Value:

Percentage of

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

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Is subject to a "side pocket" arrangement: May be subject to a suspension of participant withdrawal or redemption by the Large CPO or other governing body: May be subject to material restrictions of participant withdrawal or redemption by the Large CPO or other governing body: Is subject to a daily margin requirement:

	Large Pool's NAV
-	
-	

b. For within the specified periods of time below, enter the percentage of the <u>Large Pool's Net Asset Value</u> that could have been withdrawn or redeemed by the <u>Large Pool's</u> participants as of the <u>Reporting Date</u>. The <u>Large Pool's Net Asset Value</u> should be divided among the specified periods of time in accordance with the shortest period within which participant assets could be withdrawn or redeemed. Assume that you would impose gates where applicable but that you would not completely suspend withdrawals or redemptions and that there are no redemption fees. Base your answers on the valuation date rather than the date on which proceeds are paid to the participant(s). The percentages entered below should total 100%.

		Financing
1 day o	or less:	
2 days	– 7 days:	
8 days	– 30 days:	
31 day	rs – 90 days:	
91 day	rs – 180 days:	
181 da	lys – 365 days:	
	lys or longer.	
	, .	

## Percentage of Total Financing:

## 9. DURATION OF LARGE POOL'S FIXED INCOME ASSETS

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Reporting fund exposures.

(Give a dollar value for long and short positions as of the last day in each month of the reporting period, by sub-asset class, including all exposure whether held physically, synthetically or through derivatives. Enter "NA" in each space for which there are no relevant positions.) (Include any closed out and OTC forward positions that have not yet expired/matured. Do not net positions within sub-asset classes. Positions held in side-pockets should be included as positions of the hedge funds. Provide the absolute value of short positions. Each position should only be included in a single sub-asset class.)

(Where "duration/WAT/10-year eq." is required, provide at least one of the following with respect to the position and indicate which measure is being used: bond duration, weighted average tenor or 10-year bond equivalent. Duration and weighted average tenor should be entered in terms of years to two decimal places.)

			1st Month		2nd I	Month	3rd N	lonth
			LV	SV	LV	SV	LV	SV
a.	Listed e	quity						
	i.	Issued by financial institutions						
	ii.	Other listed equity						
b.	Unlisted	l equity		1				
	i.	Issued by financial institutions						
	ii.	Other unlisted equity						
C.	Listed e	quity derivatives						
	i.	Related to financial institutions						
	ii.	Other listed equity derivatives						
d.	Derivati	ve exposures to unlisted equities						
	i.	Related to financial institutions						
	ii.	Other derivative exposures to unlisted equities						
e.		te bonds issued by financial ons (other than convertible bonds)		1				
	i.	Investment grade						
		Duration 🗌 WAT 🗌 10-year eq						
	ii.	Non-investment grade						
		Duration 🗌 WAT 🗌 10-year eq						
f.		te bonds not issued by financial ons (other than convertible bonds)						
	i.	Investment grade .						
		Duration 🗌 WAT 🗌 10-year eq						
	ii.	Non-investment grade						
		Duration 🔄 WAT 🔄 10-year eq						

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

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g.	Convertible bonds issued by financial institutions			
	i. Investment grade			
	Duration WAT 10-year eq			
	ii. Non-investment grade			
	Duration WAT 10-year eq			
h.	Convertible bonds not issued by financial institutions			
	i. Investment grade			
	Duration WAT 10-year eq			
	ii. Non-investment grade			
	Duration WAT 10-year eq			
		·		
i.	Sovereign bonds and municipal bonds	 		 
	i. U.S. treasury securities			
	Duration WAT 10-year eq			
	ii. Agency securities			
	Duration WAT 10-year eq			
	iii. GSE bonds			
	Duration WAT 10-year eq			
	iv. Sovereign bonds issued by G10 countries other than the U.S			
	Duration WAT 10-year eq			
	v. Other sovereign bonds (including supranational bonds)			
	Duration WAT 10-year eq			
	vi. U.S. state and local bonds			
	Duration WAT 10-year eq			
j.	Loans		1	
	i. Leveraged loans			
	Duration WAT 10-year eq			
	ii. Other loans (not including repos)			
	Duration WAT 10-year eq			
		 -		
k.	Repos			

Duration 🗌 WAT 🗌 10-year eq......

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

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I. ABS/structured products

I.	ABS/structured products
	i. MBS
	Duration WAT 10-year eq
	ii. ABCP
	Duration WAT 10-year eq
	iii. CDO/CLO
	Duration WAT 10-year eq
	iv. Other ABS
	Duration WAT 10-year eq
	v. Other structured products
m.	Credit derivatives
	i. Single name CDS
	ii. Index CDS
	iii. Exotic CDS
n.	Foreign exchange derivatives (investment)
0.	Foreign exchange derivatives (hedging)
p.	Non-U.S. currency holdings
•	
q.	Interest rate derivatives
r.	Commodities (derivatives)
	i. Crude oil
	ii. Natural gas
	iii. Gold
	iv. Power
	v. Other commodities
S.	Commodities (physical)
э.	i. Crude oil
	iv. Power
	v. Other commodities
t.	Other derivatives
u.	Physical real estate

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

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V.	Investments in internal private funds								
W.	Investments in external private funds								
Х.	Investments in registered investment companies								

## y. Cash and cash equivalents

у.	Casiran							
	i.	Certificates of deposit						
		] Duration 🔄 WAT 🔄 10-year eq						
	ii.	Other deposits						
	iii.	Money market funds						
	iv.	Other cash and cash equivalents (excluding government securities)						
Z.	Investments in funds for cash management purposes (other than money market funds)							
aa.	. Investments in other sub-asset classes							

## **10. MISCELLANEOUS**

In the space below, provide explanations to clarify any assumptions that you made in responding to any question in Schedule B of this <u>Form CPO-PQR</u>. Assumptions must be in addition to, or reasonably follow from, any instructions or other guidance provided in, or in connection with, Schedule B of this <u>Form CPO-PQR</u>. If you are aware of any instructions or other guidance that may require a different assumption, provide a citation and explain why that assumption is not appropriate for this purpose.

<b>Question Number</b>	Explanation			

- This Completes Schedule C of Form CPO-PQR -

## CFTC AND NFA POOL QUARTERLY REPORT FOR COMMODITY POOL OPERATORS

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## OATH

BY FILING THIS <u>REPORT</u>, THE UNDERSIGNED AGREES THAT THE ANSWERS AND INFORMATION PROVIDED HEREIN are complete and accurate, and are not misleading in any material respect to the best of the undersigned's knowledge and belief. Furthermore, by filing this <u>Form CPO-PQR</u>, the undersigned agrees that he or she knows that it is unlawful to sign this <u>Form CPO-PQR</u> if he or she knows or should know that any of the answers and information provided herein is not accurate and complete.

Name of the individual signing this Form CPO-PQR on behalf of the CPO:

Capacity in which the above is signing on behalf of the <u>CPO</u>: