	CFTC	FORM 1-FR-FCM	0005	OMB No. 3038-0024	4
Name of Company:		Employer ID No:	N	IFA ID No:	
	0010		0020		0030
Address of Drinsing Disso of Pusingso		Person to Contac	+ Concor	aing this Bonorti	
Address of Principal Place of Business:		Person to Contac	Concern	ing this Report.	0040
				elephone No:	0040
	0050	1	<b>T</b>		0060
		1		-Mail Address:	
					0065
1. Report for the period beginning and ending:			0070 0080		
and ending.			0080		
	r quarterly/semia - Identify: 0090	annually <mark>O</mark> a	onthly 1.12	?(b)	
3. Check whether O itial Filing O m	ended Filing		0095		
4. Name of FCM's Designated Self-Regulatoy O	0100	]			
5. Name(s) of consolidated subsidiaries and affil	liated companies	:			

Name	Percentage Ownership		Line of Business	
0	0110	0120		0130
0	0140	0150		0160
0	0170	0180		0190
0	0200	0210		0220
0	0230	0240		0250

The futures commission merchant, or applicant for registration therefor, submitting this Form and its attachments and the person whose signature appears below represent that, to the best of their knowledge, all information contained therein is true, correct and complete. It is understood that all required items, statements and schedules are integral parts of this Form and that the submission of any amendment represents that all unamended items, statements and schedules remain true, correct and complete as previously submitted. It is further understood that any intentional misstatements or omissions of facts constitute Federal Criminal Violations (see 18 U.S.C. 1001)

Signed this	§	_ day of		_, 19		
Manual Sig	gnature					
Type or Pr	int Name					
<u> </u>	ef Executive Officer	0	Chief Financial Office	er		
$\sim$	neral Partner	0	Sole Proprietor			
	porate Title:					
thority: Sect	ions 4c, 4d, 4f, 4g, 5a, 8a,	and 17 of the	Commodity Exchange Ac	t (7 U.S.C.	§§ 6c, 6d, 6f, 6g, 7a,	12a and 21)

(2-88: previous editions are obsolete)

A

Name of Company:		Er	mployer ID No:		NFA ID No:	
0			0		0	
	CFTC FORM 1-FF	R-FCM				
	STATEMENT OF FINANCI		IDITION			
	AS OF 12/30/1	899				
	Assets		NewComment		Total	
	Current		NonCurrent		<u>Total</u>	
1. Funds segregated or in separate accounts pursu	iant to CEAct and the regul	ations				
A. U.S. exchanges (page 11, line 13)		1000			¢ 0	1005
<b>B.</b> Dealer options (page 12, line 2.C.)		1010			\$ 0	1015
<b>C.</b> Foreign exchanges (page 14, line 8)		1020		1025	0	1010
D. Cleared Swaps (page 15 line 13)		1022		1027	0	1032
(Do not duplicate line 1. Assets below)						1 2002
2. Cash	-	1040		1045	0	1050
<b>3.</b> Securities, at market value						
A. Firm owned		1055		1060	0	1065
B. Noncustomer-owned		1070			0	1075
<b>C.</b> Individual partners' securities accounts		1090			0	1095
D. Stock in clearing organization - cost		1100		1105	0	1110
		_				1
4. Securities purchased under resale agreements		1115		1120	0	1125
		_				
5. Receivables from and deposits with U.S. comm	odity clearing organizations					
A. Margins		1130			0	1135
B. Settlement receivable		1140			0	1145
C. Guarantee deposits		1150			0	1155
D. Net long (short) options value		1157			0	1158
6. Receivables from and deposits with foreign com	modity clearing organization	ns				
A. Margins		1160		1165	0	1170
B. Settlement receivable	1	1175			0	1180
C. Guarantee deposits		1182		1185	0	1190
D. Net long (short) options value		1191		1192	0	1193
7. Receivables from registered FCMs						
A. Net liquidating equity		1195		1200	0	1205
B. Security Deposits				1210	-	
C. Other		1220		1225	0	1230
8. Receivables from foreign commodity brokers						
A. Net liquidating equity		1235		1240	0	1245
B. Security deposits		1000		1250	0	1255
C. Other	i i i i i i i i i i i i i i i i i i i	1260		1265	0	1270

9 Receivables from traders on U.S. commodity	exchanges			
A. Customer debit and deficit accounts		1275	1280	0 1285
B. Noncustomer and proprietary accounts		1290	1295	0 1300
C. Other		1305	1310	0 1315
D. Allowance for doubtful accounts			1320	0 1325
<b>10.</b> Receivables from traders on foreign boards	of trade			
A. Customer Debit and deficit accounts		1330	1335	0 1340
B. Noncustomer and proprietary accounts		1345	1350	0 1355
C. Other		1360	1365	0 1370
D. Allowance for doubtful accounts			1375	0 1380
<b>11.</b> Inventories of cash commodities, raw mater	ials, work in prog			- 1
A. Covered		1385	1390	0 139
B. Not covered		1400	1405	0 1410
12. Secured Demand Notes				
(value of collateral	415			
Safety Factor				
\$1	.420 )	1425	1430	0 1435
13. Other receivables and advances				
A. Merchandise accounts receivable		1440	1445	0 1450
B. Notes receivable		1440	1443	0 1450
<b>C.</b> Commissions and brokerage receivable		1433	1400	0 140
<b>D.</b> Receivables from employees		1470	1475	0 1400
and associated persons		1485	1490	0 1495
E. Advances on cash commodities		1500	1505	0 1510
<b>F.</b> Dividends and interest		1515	1520	0 1525
G. Taxes receivable		1530	1535	0 1540
H. Receivable from subsidiaries and affiliates		1545	1550	0 1555
Enter Total Itemize				
	_	0 1560	0 1665	0 157
Other (itemize on a separate page)		0 1560	0 1565 1575	0 1570
J. Allowance for doubtful accounts			1575	0 1580
<b>14.</b> Unreallized gains on forward contracts		4505	4500	0 450
and commitments		1585	1590	0 1595
<b>15.</b> Exchange memberships, at cost				
(market value)				
\$1	.600		1605	0 1610
16. Investments in subsidiaries		1612	1615	0 1620
<b>17.</b> Plant, property, equipment and capitalized le	23565			
(cost net of accumulated depreciation and amor	tization of)			
\$ Enter Total Itemize 1	.625	1630	1635	0 1640
18 Prepaid expenses and deferred charges			1645	0 1650
19				
A. Other assets (itemize on a separate page)		0 1655	0 1660	0 1665
B. Retail Forex Aggregate Assets		1657	1662	0 166
		0 1070	0 1075	0 100
20 Total Assets	\$	0 1670 \$	0 1675 \$	0 1680

Name of Company:		Employ	er ID No:	NFA ID No:	
0			0	0	
CFTC FOF	RM 1-FR-FC	М			
STATEMENT OF FI	NANCIAL C	ONDITIO	NC		
	12/30/1899				
Liabilities and	Ownership	Equity			
Liabilities					
24. Develope to be able					
21. Payables to banks					2000
A. Secured loans				\$	2000
B. Unsecured loans C. Overdrafts					2010
C. Overdraits					2020
22 Equition in commodity accounts					
<ul><li>22. Equities in commodity accounts</li><li>A. Customers trading on U.S. commodity exchanges</li></ul>					2030
<b>B.</b> Customers trading on foreign exchanges					2030
<b>C.</b> Customers' dealer options accounts					2040
D. Noncustomers' accounts					2050
E. General partners' trading accounts (not included in capital)					2070
F. Customer Trading Cleared Swaps					2072
<b>23.</b> Payable to U.S. commodity clearing organizations					2080
Including short option value \$		2075			
24. Payable to foreign commodity clearing organizations					2090
Including short option value \$		2085			
<b>25.</b> Payable to registered futures commission merchants					2100
26. Payable to foreign commodity brokers					2110
<b>27.</b> Accounts payable, accrued expenses and other payables					
A. Accounts payable and accrued expenses					2120
B. Salaries, wages, commissions and bonuses payable					2130
C. Taxes payable					2140
D. Deferred income taxes					2150
E. Security deposits held					2160
F. Advances against commodities					2170
G. Unrealized losses on forward contracts and commitments H. Due to subsidiaries and affiliates					2180
					2190 2200
I. Notes, mortgages and other payables due within twelve months					
J. Obligation to Retail FX Customers					2205
	Enter Tota	1	Itemize		
					0010
J. Other (itemize on a separate page)				0	2210

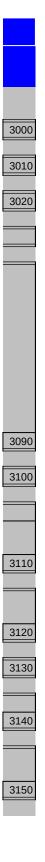
28. Notes, mortgages and other payables not due within twelve mo	onths of the date of this	statement		
A. Unsecured				2220
B. Secured				223
<b>29.</b> Securities sold under agreements to repurchase				224
				•
<b>30.</b> Securities sold not yet purchased at market value				225
<b>31.</b> Liabilities subordinated to the claims of general creditors				
A. Subject to a satisfactory subordination agreement				226
B. Not subject to a satisfactory subordination agreement				227
32. Total liabilities		\$	0	228
Ownership Equity				
33. Sole proprietorship	\$	2500		
	Ψ	1000		
34. Partnership or Limited Liability Company				
<b>A.</b> Partnership or LLC contributed and retained capital	¢	2510		
<b>B.</b> Additional capital per partnership agreement	<b>Ф</b>	1010		
(equities in partners' trading accounts, etc.)		2515		
<b>C.</b> Total	¢	0 2520		
35. Corporation				
A. Preferred stock	\$	2530		
B. Common stock	Ψ	2535		
C. Additional paid in capital		2540		
<b>D.</b> Retained earnings		2545		
E. Subtotal	\$	0 2550		
F. Less: capital stock in treasury	,	2555	)	
G. Total	\$	0 2560	)	
	¥1			
<b>36.</b> Total ownership equity (line 33, 34.C, or 35.G)		\$	0	25
<b>37.</b> Total liabilities and ownership equity (add lines 32 and 36)		\$	0	258
				-

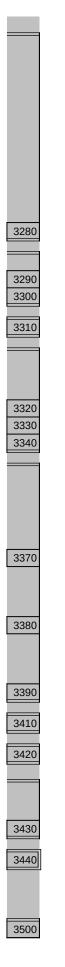
Name of Company: 0	Employer ID No: 0	NFA 0	ID No:
CFTC FORM 1-FR			
STATEMENT OF THE COMPUTATION OF THE N AS OF 12/30/18		EQUIREMENTS	
Net Capital	555		
1. Current assets (page 3, line 20)			\$ 0
2. Increase/(decrease) to U.S. clearing organization stock to reflect margin value			
3. Net current assets		\$	3 0
4.Total liabilities (page 5, line 32)	\$	0 303	0
5. Deductions from total liabilities			
A. Liabilities subject to satisfactory subordination			
agreements (page 5, line 31. A) \$	0 3040		
B. Certain deferred income tax liability			
(see regulation 1.17(c) (4) (iv))	0 3050		
C. Certain current income tax liability			
(see regulation 1.17(c) (4) (v))	0 3060		
D. Long term debt pursuant to regulation			
1.17(c)(4)(vi)	0 3070		<b>.</b>
E. Total Deductions (add lines 5.A 5.D)	(	0 308	
F. Adjusted liabilities (subtract line 5.E from line 4)			0
6. Net capital (subtract line 5.F from line 3)		\$	0
Charges against Not Capital (see regulation 1.17(a) (E))			
Charges against Net Capital (see regulation 1.17(c) (5)) 7. Excess of advances paid on cash commodity			
contracts over 95% of the market value	Enter Total	Itemize	
of commodities covered by such contracts			\$ 0
			\$ 0
8. Five percent (5%) of the market value of inventories covered by open futures con	tracts or		
commodity options (no charges are applicable to inventories registered as delive			
contract market and which are covered by futures contracts)			0
			-
9. Twenty percent (20%) of market value of uncovered inventories			0
			-
<b>10.</b> Ten percent (10%) of the market value of commodities underlying fixed price co	ommitments		
and forward contracts which are covered by open futures contracts or commodi			0
11. Twenty percent (20%) of the market value of commodities underlying fixed price	)		
commitments and forward contracts which are not covered by open futures con			
or commodity options			0

12. Charges as specified in section 240.15c3-1(c) (2) (vi) and (v	rii) against securities ow	ned by the firm,	including		
securities representing investments of domestic and foreign	customer funds:				
	Market Value	Charge	e		
A. U.S. and Canadian Government obligations	0	3160	0	3170	
B. State and Muncipal government					
obligations	0	3180	0	3190	
C. Certificates of Deposit, commercial					
paper and bankers acceptances	0	3200	0	3210	
D. Corporate obligations	0	3220	0	3230	
E. Stocks and warrants	0	3240	0	3250	
F. Other securities	0	3260	0	3270	
G. Total charges (add lines 12.A - 12.F)					0
<b>13.</b> Charges as specified in section 240.15c3-1(c) (2) (iv) (F)					
A. Against securities purchased under agreements to resell					0
B. Against securities sold under agreements to repurchase					0
<b>14.</b> Charges on securities options as specified in section 240.15	ic3-1 Appendix A				0
<b>15.</b> Undermargined commodity futures and option accounts a	mount in each account	required to			
meet maintenance margin requirements, less the amount of					
and the amount of any noncurrent deficit in the account	current margin cans in				
				L I	0
A. Customer accounts					0
B. Noncustomer accounts					0
C. Omnibus accounts					0
10 Obarras ansistant and a summative assistant is preprietant					
<b>16.</b> Charges against open commodity positions in proprietary ac					
A. Uncovered exchange-traded futures and granted option co	ontracts				
i. percentage of margin requirements applicable to such					
contracts		\$	0	3350	
ii. less: equity in proprietary accounts included in					
liabilities			0	3360	0
B. Ten percent (10%) of market value of commodities which the	underlie commodity				
options not traded on a contract market carried long by the	e applicant				
or registrant which has value and such value increased ad	justed			_	
net capital (this charge is limited to the value attributed to	such options)				0
C. Commodity options which are traded on contract markets	and				
carried long in proprietary accounts . Charge is the same a	as would				
be applied if the applicant or registrant was the grantor of t	he				
options (this charge is limited to the value attributed to suc				[	0
17. Five percent (5%) of all unsecured receivalbes from foreign	brokers				0
<b>18.</b> Deficiency in collateral for secured demand notes					0
<b>19.</b> Adjustment to eliminate benefits of consolidation	E	inter Total	Itemize		
(explain on a separate page)				ſ	0
(explain on a separate page)					
20. Total charges (add lines 7 through 20)				\$	0
Net Capital Computation					
<b>21.</b> Adjusted net capital (subtract line 21 from line 6)					0

22. Net Capital required				
A. Risk Based Requirement				
i. Amount of Customer Risk		_		
Maintenance Margin	3515			
ii. Enter 8% of line 22.A.i		0	3525	
iii. Amount of Non-Customer Risk				
Maintenance Margin	3535	, ,		
iv. Enter 8% of line 22.A.iii		0	3545	
v. Enter the sum of 22.A.ii and 22.A.iv		0	3555	
B. Minimum DollarAmount Requirement			3565	
C. Other NFA Requirement			3575	
D. Enter the greater of lines 22.A.v, 22.B or 22.C.				#VALUE!
23. Excess Net Capital (line 21 less line 22.C.)			\$	#VALUE!
Computation of Early Warning Level				
24. Enter the greater of 110% 22.A.v. or 150% of 22.B. or 150%	of 22.C or \$375,000.		\$	#VALUE!
This is your early warning capital level. If the amount is greater	than the amount on line 22, y	ou must immediately no	tify your	
DSRO and the Commission and begin filing monthly financial re-	ports pursuant to section 1.12	2 of the regulations.		
Guaranteed Introducing Brokers				
25 List all IBs with which guarantee agreements have been enter	red into by the FCM and whic	h are currently in effect.		
<u> </u>				

(List additional IBs on a separate page)







-

Name of Company:Employer ID No:NFA ID No:000	
CFTC FORM 1-FR-FCM STATEMENT OF INCOME(LOSS)	
FOR THE PERIOD FROM 12/30/1899 THROUGH 12/30/1899 Revenues	
1. Commissions and brokerage	
A. Commodity transactions on U.S. commodity exchanges       \$         B. Commodity transactions on foreign commodity exchanges       Enter Total       Describe	4000 4010
C. Securities transactions	4020
D. Other brokerage activities (describe on a separate page)	0 4030
2. Firm trading accounts	4040
A. Commoditiy transactionsEnter TotalDescribeB. Securities transactionsEnter TotalDescribe	4040
C. Other firm trading (describe on a separate page)	0 4060
3. Income from advisory services	4070
4. Interest and dividends	
A. Interest earned on investments of customers' funds	4080
<ul> <li>B. Interest earned on investments other than customers' funds</li> <li>C. Dividends</li> </ul>	4090 4100
	4100
Enter Total Itemize	
5. Other income (itemize on a separate page)	0 4110
6. Total revenue	0 4120
ф   	
Expenses 7. Sales personnel commissions \$	4200
8. Floor brokerage	4210
9. Clerical and administrative employees' expenses	4220
10. Commissions to other FCMs	4230
11. Exchange clearance fees	4240
12. Occupancy and equipment costs	4250
13. Promotional costs	4260
14. Communications	4270
15. Data processing	4280
16. Bad debt expense	4290
17. Trade errors	
A. Customers' accounts B. Other	4300 4310
18. Interest	4320
	4320
Enter Total Itemize	
19. Other expenses (itemize on a separate page)	0 4330
20. Total expenses	0 4340
φ 	
21. Income (loss) before income taxes and items below       \$	0 4400
22. Provision for income taxes	4410
23. Equity in earnings (losses) of unconsolidated subsidiaries, less applicable tax	4420
24. Extraordinary gains (losses), less applicable tax	4430
25. Cumulative effect of changes in accounting principles, less applicable tax	4440
26. Net Income (loss) \$ (2-88)	0 4450

Name of Company:	Employer ID No:		NFA ID	No:				
0	0		0					
CFTC FORM 1-FR-FCM STATEMENT OF CHANGES IN OWNERSHIP EQUITY								
		THROUGH 12/30/1899						
<b>1.</b> Total ownership equity as previously reported			\$		4500			
			Ψ					
2. Net Income (loss) for the period				0	4510			
<b>3.</b> Other Additions to capital (explain	Enter Total	Explain						
below)				0	4520			
					4500			
4. Dividends			(	)	4530			
5. Other deductions from capital (including partner and								
proprietary withdrawals)	Enter Total	Explain			45.40			
(explain below)			0	0	4540			
6. Balance (page 5 line 36)			\$	0	4550			
	CFTC FORM 1-FR-	ECM						
STATEMENT OF CHANGES IN LIABILI	TIES SUBORDINATE	TO THE CLAIMS OF						
		DRDINATION AGREEM THROUGH 12/30/1899						
		All satisfactor	<b>y</b>	Debt that Qualifies				
		Subordinated D	ebt	as Equity Capital*				
<b>1.</b> Total subordinated borrowings as previously reported	ed .	6	4600	6	4605			
Enter Total	Explain							
2. Increases (explain below)		0	4610	0	4615			
Delowy			4010	0	4015			
<b>3.</b> Decreases (explain	Explain							
below)		( 0	) 4620 (	0)	4625			
4. Balance (page 5, line 31.A)		\$ 0	4630	0 4	4635			
		Ψ		μ				
* Equity Capital is defined in regulation 1.17(d).								

Name of Company:	Employer ID No:	NFA ID No:	
0 CFTC FORM	0 1 1-FR-FCM	0	
STATEMENT OF SEGREGATION REQIREMENTS AND FUNDS IN SEGREG AS OF 12		ING ON U.S. COMMO	DITY EXCHANGES
SEGREGATION REQUIREMENTS (Section 4d(2) of the CEAct)	212011033		
1. Net ledger balance			
A. Cash		\$	5000
B. Securities (at market)			5010
2. Net unrealized profit (loss) in open futures contracts traded on a c	ontract market		5020
3. Exchange traded options			
A. Market value of open option contracts purchased on a contract	t market		5030
B. Market value of open option contracts granted (sold) on a cont	tract market		5040
4. Net equity (deficit) (Add lines 1, 2 and 3)		\$	0 5050
		•	
<ol> <li>Accounts liquidating to a deficit and accounts with debit balances- gross amount</li> </ol>	¢.	5060	
Less: amount offset against U.S. Treasury obligations owned by			0 5000
particular customers	()	5070	0 5080
6. Amount required to be segregated (add lines 4 and 5)		\$	0 5090
FUNDS IN SEGREGATED ACCOUNTS		•	
7. Deposited in segregated funds bank accounts			
A. Cash		\$	5100
B. Securities representing investments of customers' funds (at m.			5110
<li>C. Securities held for particular customers or option customers in margins (at market)</li>	lieu of cash		5120
<ol> <li>Margins on deposit with clearing organizations of contract markets</li> <li>A. Cash</li> </ol>	S:		5130
B. Securities representing investments of customers' funds (at m	arket)		5140
C. Securities held for particular customers or option customers in			
margins (at market)			5150
9. Net settlement from (to) clearing organizations of contract markets	S		5160
<ul><li>10. Exchange traded options</li><li>A. Value of open long option contracts</li></ul>			5170
<b>B.</b> Value of open short option contracts		(	) 5180
		A	
<ol> <li>Net equities with other FCMs</li> <li>A. Net liquidating equity</li> </ol>			5190
<b>B.</b> Securities representing investments of customers' funds (at m	arket)		5200
C. Securities held for particular customers or option customers in			5210
	Enter Total Descr	ibe	
<b>12.</b> Segregated funds on hand (describe on separate page):			0 5215
13. Total amount in segregation (add lines 7 through 12)		\$	0 5220
14. Excess (deficiency) funds in segregation (subtract line 6 from line	13)	\$	0 5230
<b>15.</b> Management Target Amount for Excess funds in segregation			
			5240

Name of Company:	Employer ID No:	NFA ID No:
0	0	0
CFTC FC	DRM 1-FR-FCM	
STATEMENT OF SEGREGATION REQIREMENTS AND FUNDS IN SEGREGATION FOR CUSTOMERS TRADING ON U.S. COMMODITY EXCHANGES		
AS OF 12/30/1899		
SEGREGATION REQUIREMENTS (Section 4d(2) of the CEAct)		
16. Excess (deficiency) funds in segregation over (under) Manage	ment	
Target Amount Excess		
		0 5250
(2-88)		

Name of Company:	Employer ID No:	NFA ID No:	
0	0	0	
	CFTC FORM 1-FR-FCM		
	T OF SEGREGATION REQIREMENTS AND FU		
IN SEGREGATION	ON FOR CUSTOMERS DEALER OPTIONS AC	COUNTS	
	AS OF 12/30/1899		
1. Amount required to be segregated in acco	ordance with Commission regulation 32.6	\$	5400
2. Funds in segregated accounts			
a. Cash	\$	5410	
<b>b.</b> Securities (at market)		5420	
<ul> <li>b. Securities (at market)</li> <li>c. Total</li> </ul>		5420	0 5430
× ,		5420	0 5430

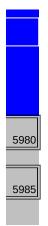
0 0 CFTC FORM 1-FR-FCM STATEMENT OF SECURED AMOUNTS AND FUNDS HELD IN SEPARATE ACCOUNTS PURSUANT TO COMMISSION REGULATION 30.7 AS OF 12/30/1899 FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS AMOUNT required to be set aside guilsuant to law and for the fation of a forgeign 5605				
CETC FORM 1-FR-FCM STATEMENT OF SECURED AMOUNTS AND FUNDS HELD IN SEPARATE ACCOUNTS PURSUANT TO COMMISSION REGULATION 30.7 AS OF 12/30/1899 FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS ACCOUNT FOR USE A SAME AND FOREIGN OPTIONS SECURED AMOUNTS ACCOUNT FOR USE A SAME AND FOREIGN OPTIONS TRACING A MARCEN ACCOUNT FOR USE A SAME AND FOREIGN OPTIONS TRACING - All Customers A. Cash Securities (at market) 2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade S. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade A. Market value of open contracts granted (sold) on a foreign board of trade A. Market value of open contracts granted (sold) on a foreign board of trade A. Net equity (deficit) (add lines 1., 2., and 3.) O 5645 5. Accounts liquidating to a deficit and accounts with	Name of Company:	Employer ID No:	NFA ID No:	
STATEMENT OF SECURED AMOUNTS AND FUNDS HELD IN SEPARATE ACCOUNTS PURSUANT TO COMMISSION REGULATION 30.7 AS OF 12/30/1899 FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS AWOUNT required 10.96 set aside gutsuant big laws tube outfight/2010 held lavejon 5605 1. Net ledger balance - Foreign Futures and Foreign Options Trading - All Customers A. Cash Securities (at market) 2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade A. Market value of open option contracts purchased on a foreign board of trade A. Market value of open option contracts purchased on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with		0	0	
REGULATION 30.7 AS OF 12/30/1899         FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS         Government of the profest self-de gut study big any study bi				
AS OF 12/30/1899  FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS  Advount required to be set aside gursuant to grave rule of a foreign of a foreign  Accash  A. Cash  A. Cash  Securities (at market)  C. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade  A. Market value of open option contracts purchased on a foreign board of trade  A. Market value of open contracts granted (sold) on a foreign board of trade  4. Net equity (deficit) (add lines 1., 2., and 3.)  O 5645		ACCOUNTS PURSU	NT TO COMMISSION	
FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS         Advoumt required to be of a serie equivalent by log anyzation of the origin of a long ion         Advoumt required to be of a serie equivalent by log anyzation of the origin of a long ion         Advoumt required to be of a serie equivalent by log anyzation of the origin of a long ion         5605         1. Net ledger balance - Foreign Futures and Foreign Options Trading - All Customers         A. Cash       5615         B. Securities (at market)       5617         2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade       5625         3. Exchange traded options       A. Market value of open option contracts purchased on a foreign board of trade       5635         B. Market value of open contracts granted (sold) on a foreign board of trade       5637         4. Net equity (deficit) (add lines 1., 2., and 3.)       0       5645				
Advocumment required to be set aside putstation of the factor of a foreign of trade options a foreign of trade of trade options a foreign of trade of trade options a foreign of trade options of trade options a foreign of trade options of trade options a foreign of trade options and foreign of trade options a foreign of trade options and foreign of trade options a foreign option contracts purchased on a foreign option of trade options a foreign option contracts purchased on a foreign option option contracts purchased of trade options a foreign option contracts options and of trade options a foreign option contracts options a foreign option option contracts options a foreign option option contracts options a foreign option contracts options a foreign option option contracts options a foreign option contracts options a foreign option option contracts options a foreign options a	AS OF 12/30/1899			
Advocumment required to be set aside putsuant to law, rule or the full deliver of a foreign of trade of	FOREIGN FUTURES AND FOREIGN OPTIONS SECURED AMOUNTS			
5605         1. Net ledger balance - Foreign Futures and Foreign Options Trading - All Customers         A. Cash         5615         B. Securities (at market)         2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade         5625         3. Exchange traded options         A. Market value of open option contracts purchased on a foreign board of trade         5635         B. Market value of open contracts granted (sold) on a foreign board of trade         5637         4. Net equity (deficit) (add lines 1., 2., and 3.)         0         5645				
5605         1. Net ledger balance - Foreign Futures and Foreign Options Trading - All Customers         A. Cash         5615         B. Securities (at market)         2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade         5625         3. Exchange traded options         A. Market value of open option contracts purchased on a foreign board of trade         5635         B. Market value of open contracts granted (sold) on a foreign board of trade         5637         4. Net equity (deficit) (add lines 1., 2., and 3.)         0         5645	Amount required to be set aside ausuant to law, rule or regulation of a foreign			
A. Cash B. Securities (at market) 2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade 3. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade B. Market value of open contracts granted (sold) on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with	government of a rule of a sen-regulatory organization authorized thereditier			5605
A. Cash B. Securities (at market) 2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade 3. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade B. Market value of open contracts granted (sold) on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with				
B. Securities (at market)       5617         2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade       5625         3. Exchange traded options       5635         A. Market value of open option contracts purchased on a foreign board of trade       5635         B. Market value of open contracts granted (sold) on a foreign board of trade       5637         4. Net equity (deficit) (add lines 1., 2., and 3.)       0       5645         5. Accounts liquidating to a deficit and accounts with       5637	1. Net ledger balance - Foreign Futures and Foreign Options Trading - All Customers		_	_
2. Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade 3. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade B. Market value of open contracts granted (sold) on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with	A. Cash			5615
3. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade B. Market value of open contracts granted (sold) on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with	B. Securities (at market)			5617
3. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade B. Market value of open contracts granted (sold) on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with			-	
3. Exchange traded options A. Market value of open option contracts purchased on a foreign board of trade B. Market value of open contracts granted (sold) on a foreign board of trade 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with	2 Net unrealized profit (loss) in open futures contracts traded on a foreign board of trad	ie		
A. Market value of open option contracts purchased on a foreign board of trade 5635 B. Market value of open contracts granted (sold) on a foreign board of trade 5637 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with				5625
A. Market value of open option contracts purchased on a foreign board of trade 5635 B. Market value of open contracts granted (sold) on a foreign board of trade 5637 4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with				
B. Market value of open contracts granted (sold) on a foreign board of trade 5637 4. Net equity (deficit) (add lines 1., 2., and 3.) 5. Accounts liquidating to a deficit and accounts with				
4. Net equity (deficit) (add lines 1., 2., and 3.) 0 5645 5. Accounts liquidating to a deficit and accounts with				
5. Accounts liquidating to a deficit and accounts with	B. Market value of open contracts granted (sold) on a foreign board of tr	ade		5637
5. Accounts liquidating to a deficit and accounts with				
5. Accounts liquidating to a deficit and accounts with	4 Net equity (deficit) (add lines 1, 2, and 3)			
			0	5645
debit balances - gross amount 5651	5. Accounts liquidating to a deficit and accounts with		-	
	debit balances - gross amount	5651	L	_
Less: amount offset by customer owned securities565205654	Less: amount offset by customer owned securities	5652	2 0	5654
6. Amount required to be set aside as the secured amount - Net Liquidating Equity Method (add lines	6. Amount required to be set aside as the secured amount - Net Liquidating Equity Meth	hod (add lines		
	4 and 5)	•	0	5655
7. Greater of amount required to be set aside pursuant to foreign jurisdiction (above) or line 6. 0 5660	7. Greater of amount required to be set aside pursuant to foreign jurisdiction (above) or	line 6.	0	5660



Name of Company: 0	Employer ID No: 0	NFA ID No: 0
CFTC FORM 1-FR-FC STATEMENT OF SECURED AMOUNTS AND FUNDS F FOR FOREIGN FUTURES AND OPTIO PURSUANT TO COMMISSION REG AS OF 12/30/1899	HELD IN SEPARATE ACCOUN	NTS
FUNDS DEPOSITED IN SEPARATE REGULATION 30.7 ACCOUNTS		
1. Cash in Banks         A. Banks located in the United States         B. Other banks qualified under Regulation 30.7	5700	]
Name(s): 5710	0 5720	0
<ul> <li>2. Securities</li> <li>A. In safekeeping with banks located in the United States</li> <li>B. In safekeeping with other banks qualified under Regulation 30.7 Name(s):</li> </ul>	5740 0 5760	0
<ul> <li>3. Equities with registered futures commission merchants</li> <li>A. Cash</li> <li>B. Securities</li> <li>C. Unrealized gain (loss) on open futures contracts</li> <li>D. Value of long option contracts</li> <li>E. Value of short option contracts</li> </ul>	5780 5790 5800 5810 () 5815	0
4. Amounts held by clearing organizations of foreign boards of trade		
Name(s):       5830       O       O         A. Cash       B. Securities       C. Amount due to (from) clearing organizations - daily variation         D. Value of long option contracts       E. Value of short option contracts	0 5840 0 5850 0 5860 0 5870 ( 0 5875	0
5. Amounts held by members of foreign boards of trade		
Name(s):       5890       O       O         A. Cash       B. Securities       C. Amount due to (from) clearing organizations - daily variation         D. Value of long option contracts       E. Value of short option contracts	0 5900 0 5910 0 5920 0 5930 ( 0 5935	0
6. Amounts with other depositories designated by foreign boards of trade Name(s): 5950	nter Total O stail	0
7. Segregated funds on hand (describe:	nter Total O etail	0
8. Total funds in separate section 30.7 accounts (to Page 13, line 2)		0
		0
9. Excess (deficiency) set Aside Funds for Secured Amount (subtract Line 7 Secured 16 from Line 8)	ured Statement page	0

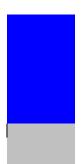
Name of Company:	Employer ID No:	NFA ID No:
0	0	0
CFTC FORM 1-FR-	FCM	
STATEMENT OF SECURED AMOUNTS AND FUND		COUNTS
FOR FOREIGN FUTURES AND OP		
PURSUANT TO COMMISSION REGULATION 30.7		
AS OF 12/30/18	99	
<b>10.</b> Management Target Amount for Excess funds in separate section 30.7 acc	counts	
11. Excess (deficiency) funds in separate 30.7 accounts over (under) Manager	ment Target	0
A. If any securities shown above are other than the types of securities referred	to in Commission regulatior	n 1.25, attach a separate
schedule detailing the obligations shown on each such line.		





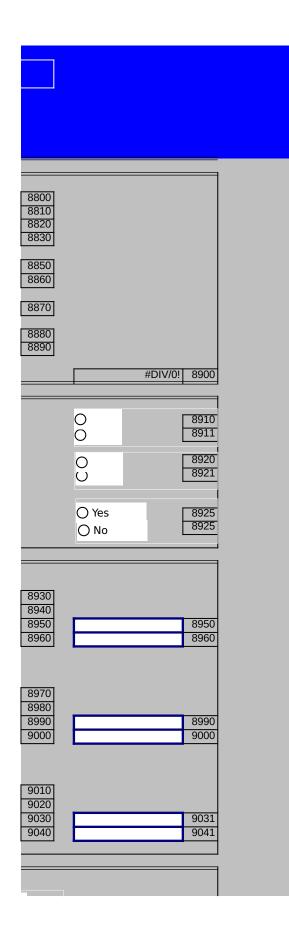
Name of Company: 0	Employer ID No: 0	NFA ID No: 0	
CFTC FORM 1-FR-F STATEMENT OF CLEARED SWAPS CUSTOMER SEGREGATION REQUIREMENT UNDER 4D(F) of CE AS OF 12/30/189	TS AND FUNDS IN CLEARED S	NAPS CUSTOMER ACCOL	JNTS
Cleared Swaps Customer Requirements			
<ol> <li>Net ledger balance</li> <li>A. Cash</li> <li>B. Securities (at market)</li> </ol>		\$	8500 8510
2. Net unrealized profit (loss) in open cleared OTC derivatives			8520
<ol> <li>Cleared OTC derivatives options</li> <li>A. Market value of open cleared OTC derivatives option contracts purcha</li> <li>B. Market value of open cleared OTC derivatives option contracts grantee</li> </ol>			8530 8540
4. Net equity (deficit) (Add lines 1, 2 and 3)		\$ 0	8550
<ul> <li>5. Accounts liquidating to a deficit and accounts with debit balances- gross amount</li> <li>Less: amount offset by customer owned securities</li> </ul>	\$ 856 () 857	<b>⊣</b>	8580
6. Amount required to be sequestered for cleared OTC derivatives customer	s (add lines 4 and 5)	\$ 0	8590
Funds in Cleared OTC Derivatives Customer Sequestered Accounts			
<ul> <li>7. Deposited in cleared OTC derivatives customer sequestered accounts at A. Cash</li> <li>B. Securities representing investments of customers' funds (at market)</li> <li>C. Securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers or option customers in lieu of customers and the securities held for particular customers and</li></ul>		\$	8600 8610
margins (at market)			8620
<ul> <li>8. Margins on deposit with derivatives clearing organizations in cleared OTC</li> <li>A. Cash</li> <li>B. Securities representing investments of customers' funds (at market)</li> <li>C. Securities held for particular customers or option customers in lieu of of margins (at market)</li> </ul>		tered accounts	8630 8640 8650
9. Net settlement from (to) derivatives clearing organizations			8660
<ul> <li>10. Cleared OTC derivatives options</li> <li>A. Value of open cleared OTC derivatives long option contracts</li> <li>B. Value of open cleared OTC derivatives short option contracts</li> </ul>		( )	8670 8680
<ol> <li>Net equities with other FCMs</li> <li>A. Net liquidating equity</li> <li>B. Securities representing investments of customers' funds (at market)</li> <li>C. Securities held for particular customers or option customers in lieu of customers in lieu of customers or option customers or option customers in lieu of customers or option customers option customers</li></ol>	cash (at market)		8690 8700 8710
<b>12.</b> Cleared OTC derivatives customer funds on hand		0	8715
<b>13.</b> Total amount in sequestration (add lines 7 through 12)		\$ 0	8720
<b>14.</b> Excess (deficiency) funds in sequestration (subtract line 6 from line 13)		\$ 0	8730
15. Management Target Amount for Excess funds in cleared swaps segregate	ed accounts	0	8760
16. Excess (deficiency) funds in cleared swaps customer accounts over (under	er)	0	8770

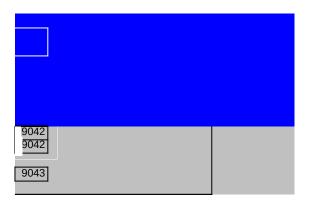
Name of Company:	Employer ID No:	NFA ID No:
0	0	0
CFTC FORM 1-FR-F	СМ	
STATEMENT OF CLEARED SWAPS CUSTOMER SEGREGATION REQUIREMENTS AND FUNDS IN CLEARED SWAPS CUSTOMER ACCOUNTS UNDER 4D(F) of CEA AS OF 12/30/1899		
Cleared Swaps Customer Requirements		
Management Target Excess		
(2-88)		



Name of Company:	Employer ID No:	NFA ID No:
0	0 CFTC FORM 1-FR-FCM	0
F	Exchange Supplementary	
	Requirements Section 16 Information	
	AS OF 12/30/1899	
Leverage Calculation		
<ul> <li>a. Total Assets</li> <li>b. Amount required to be segregated</li> </ul>		0
c. Amount required to be set aside in separate section	30.7 accts	0
d. Amount required to be sequestered for cleared OTC		0
derivatives customers		
f. US Treasury securities - Long (firm owned)		
<ul> <li>g. US Government agency and government sponsored</li> <li>Long (firm owned)</li> </ul>	d entities -	
Long(firm owned) h. Reverse Repos backed by US Treasury securities a	and	
US Government agency and govt sponsored entitie		
i. Ownership Equity	`````	0
j. Subordinated Loans		0
Lavorago		
Leverage		
Depositories		
During the month did the firm maintain customer segregate	ed funds at a depository which is an affiliate	?
During the month did the firm maintain separate 30.7 funds	s at a depository which is an affiliate?	
buing the month did the inn maintain separate 50.7 fund		
During the month did the firm maintain cleared swaps cust	omer segregated funds at a depository whic	h is an affiliate?
FCM's Customer Segregated Funds Residual Interest	Target (choose one):	
a. Minimum dollar amount:		
<ul> <li>b. Minimum percentage of customer segregated funds rec</li> </ul>	luired:	
c. Dollar amount range between:		
d. Percentage range of customer segregated funds require	ed between:	
FCM's Customer Secured Amount Funds Residual Inte	erest Target (choose one):	
a. Minimum dollar amount:		
b. Minimum percentage of customer segregated funds rec	luired:	
c. Dollar amount range between:		
d. Percentage range of customer segregated funds require	d between:	
FCM's Cleared Swaps Customer Collateral Residual In	terest Target (choose one):	
a. Minimum dollar amount:		
<ul><li>b. Minimum percentage of cleared swaps customer collate</li></ul>	eral required:	
c. Dollar amount range between:	sianoquilou.	
d. Percentage range of cleared swaps customer collateral	required between:	
Eligible Contract Participant Information		
		-

Name of Company:	Employer ID No:	NFA ID No:
0	0	0
CFTC FORI	/ 1-FR-FCM	
Exchange Su	pplementary	
NFA Financial Requirement	nts Section 16 Information	1
AS OF 12/30/1899		
Did the firm act as counterparty to a forex transaction with any Eligible (	Contract Participants (ECPs	s)? O Yes
O No		
If yes, indicate the number of ECPs that the firm acted as a counterparty to a forex transaction(s).		





Enter the bo	x number, reason and change am	ount below
Box Number	Reason	Amount
	_	

Other Payables Itemization (Box 2210)		
	0	
Description	Payable Amount	

### FREEDOM OF INFORMATION ACT ("FOIAct") NOTICE

Certain statements and schedules in financial reports received by the Commission from futures commission merchants ("FCMs") are considered by the Commission to be a public record, copies of which may be obtained upon written request to the Commission's Freedom of Information, Privacy and Sunshine Acts compliance staff in Washington, D.C. Such financial reports include CFTC Form 1-FR-FCM and Securities and Exchange Commission Financial and Operational Combined Uniform Single Report ("FOCUS report"). Pursuant to Section 1.10(g) of the Commission's regulations, the following portions of these reports will be considered public and be made available pursuant to requests received under the FOIAct:

(1) the Statement of Financial Condition;

(2) the Statement of the Computation of the Minimum Capital Requirements (the schedule of guaranteed introducing brokers that is to be included with this statement in Form 1-FR-FCM will be considered public);

(3) the Statement of Segregation Requirements and Funds in Segregation for Customers Trading on U.S. Commodity Exchanges;

(4) the Statement of Segregation Requirements and Funds in Segregation for Customers' Dealer Options Accounts;

(5) the Statement of Secured Amounts and Funds Held in Separate Accounts for Foreign Futures and Foreign Options Customers;

(6) supplemental schedules that explain or provide additional details concerning any line item for which a supplemental schedule is specifically called for by the statements set forth in (1) through (5) above; and

(7) the independent public accountant's opinion, if the report is audited.

These statements will be considered public whether filed in electronic or in hard copy form. All other statements or schedules included in form 1-FR-FCM or the FOCUS report, and notes to audited financial reports will be deemed non-public.

Generally, the Commission may disclose to third parties portions of the "nonpublic" information in the report under the following circumstances: (1) in connection with matters in litigation; (2) in connection with Commission investigations; (3) where the information is furnished to regulatory, self-regulatory and law enforcement agencies to assist them in meeting responsibilities assigned to them by law; and (4) where disclosure is required under the FOIAct.

Petitions for confidential treatment filed by an FCM with respect to any of the public information contained in the Form 1-FR-FCM or the FOCUS report will not be processed by Commission staff. However, if the applicant or registrant believes that the placing of any other information submitted on or with its report in the Commission's public files would constitute an unwarranted invasion of the applicant's or registrant's personal privacy or would reveal sensitive business information, the registrant or applicant may petition the Commission to treat such other information as nonpublic pursuant to Section 145.9 in response to requests under the Freedom of Information Act. Section 145.9 of the Commission's regulations affords the applicant or registrant the right to notice and a right to appeal any Commission staff decision to disclose non-public information pursuant to a request for information under the FOIAct.

## National Futures Association Supplemental Schedule FCM

#### A) Capital Requirements and Restrictions

This schedule provides additional information and calculations which are required by National Futures Association but are not provided for on the Form 1-FR. All FCMs (including securities brokers/dealers) must complete Sections A & B.

		1 Minimum Capital Requirement	2 Early Warning Requirement	3 Equity Withdrawal Restriction	4 Suspended Repayment Restriction
A. Minimum dollar amount		1,000,000	1,500,000	#VALUE!	#VALUE!
<b>B.</b> Calculation based on branch offices					
# branch offices					
# guaranteed IBs					
# branch offices of guaranteed IBs	0	0	0	0	0
C. Calculation based on associated					
persons					
# associated persons					
# associated persons of guaranteed IBs					
=	0	0	0	0	0
D. Calculation based on customer funds					
Customer funds required to be					
segregated and foreign futures/					
options secured amount, less market					
value of options up to the amount					
of funds in the customer's account		0	0	0	0
E. Forex Dealer Members ONLY					
8. Gross revenue from Forex transactions					
with retail customers					
9. Total net aggregate notional value of all					
open Forex transactions in retail customer					
and non-customer (not proprietary)					
accounts		0	0	0	0
<b>10</b> . Total aggregate retail forex assets					
[Reference CFTC Regulation 5.1(b)]	0				
<b>11</b> . Total amount of retail forex obligation					
[Reference CFTC Regulation 5.1(I)]	0	0			
F. Calculation based on Risk Margin		0	0	0	0
Greatest of A to F		1,000,000	1,500,000	#VALUE!	#VALUE!
		ed debt maturing	-		0
	+ Expected ca	pital withdrawals			
			Total	#VALUE!	0

<ul> <li>National Futures Association Supplemental Schedule FCM</li> <li>B) Equity Capital Ratio</li> <li>Equity capital must be at least 30% of the required total shown here.</li> </ul>			
Ownership Equity	0	Ownership Equity	0
+ Qualifying subordinated debt	0	+ Total subordinated debt	0
= Equity Capital	0		
-		= Required Total	0
	Equity Capital/Re	quired Total: 0.0000%	

	heagea but not registere	d as deliverable; 20% if unhe	edged			
Receivable Amount	Description	Market Value	Charge *	Net	NonCur	rent Rec
					0	
					0	
					0	
					0	
					0	
					0	
					0	
					0	
					0	
					0	

D) Advances Paid	on Cash Commodities	(Net Capital Computation L	ine 7)		\$	
		Collateral				
Advance Amount Description	Description	Market Value	Charge	Net	Capital Charge	
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		
			95%	0		

05:58:42

## National Futures Association Supplemental Schedule FCM

E) Inventory/Fixed Price Commitments/Forward Contracts (Net Capital Computation Lines 8-11)

	(not oupman compatation	
5% charge ite	ems 0	1
10% charge ite	ems 0	
20% charge ite	ems O	
Total Market va	alue 0	

Description	Market Value	Charge Pct	Charge Amount
			0
			0
			0
			0
			0
			0
			0

05	:58	:42

# National Futures Association Supplemental Schedule FCM

F) Undermargined Accounts (Net Capital Computation Line 15)

			Total Charge:	0
Account Number	Maint. Margin	Equity Securities	Current Margin Call	Charge Amount
				0
				0
				0
				0
				0
				0
				0
				0
				0
				0
				0

Account Number	Maint. Margin	Charge Pct	Charge Amo
	-		
	_		