

COMPLIANCE:

General Firm Information

1. Signed and dated attestation from NFA Self Exam Checklist.
2. Names of FCMs, CPOs, IBs, CTAs that Firm does Business with
3. List of Affiliates and Related Entities
4. Exemption Letters (4.7 and 4.12)
5. Firm procedures manual
6. Privacy policy
7. Ethics procedures and proof of completion of ethics training
8. Disaster recovery/business continuity procedures

Registration

1. Articles of Incorporation / Partnership Agreement / LLC Info
2. Stock Certificates / Ledgers / Representation of Ownership
3. Minutes to Board of Directors' Meetings [last 12 months]
4. List of Firm Associated Persons (indicate) those with discretionary authority over customer accounts and b) those who supervise)
5. List of Firm Branch Offices [include APs by branch]
6. Recent Equity Run or Customer Account List
7. Customer Account Documents (specific accounts to be selected during fieldwork)
8. Cash Receipts/Disbursements Journal
9. Bylaw 1101 Procedures

Records

1. Recent Equity Run or Customer Account List
2. Customer Account Documents (specific accounts to be selected during fieldwork)
3. Firm's Additional Risk Disclosure Procedures

Cash Activity

1. List of the Firm's Proprietary and Non-Customer Accounts
2. Monthly Carrying Broker Statements for Proprietary and Non-Customer Accounts
3. Cash Receipts/Disbursements Journal for Firm's Operating Account
4. Bank Statements for Firm's Operating Account (including deposit slips and canceled checks)

Orders

1. Firm's Order Tickets [last 5 months]
2. Flowchart of Electronic Order Entry System

3. Procedures for Electronic Order System

Bunched Orders

1. Firm's Procedures for Bunched Orders and Split Fill Allocation
2. Firm's Order Tickets
3. Monthly Customer Account Statements
4. List of Eligible Accounts for Post-Execution Orders
5. Post-Execution Allocation Origination Documents

Promotional Material

1. Firm's Promotional Material File
 - Print (magazine, newspaper, etc.)
 - Video (tape and script)
 - Radio (tape and script)
 - Direct Mail
 - On-Line Computer (Internet, on-line services, e-mail correspondence)
 - Newsletters
 - Hotlines
 - Seminar Tapes/Materials/Outlines
 - Cover Letters Sent with Customer Statements
2. Supporting documentation for all claims or performance results in Promotional Materials

Solicitations

1. Tapes of AP Sales Solicitations
2. Scripts or Outlines Used by APs for Training/Sales Solicitations
3. Names of Entities Which Provide Lead Lists to Firm [include address, phone number, cost, frequency, etc.]

Supervision

1. Firm's List of Branch Offices and Guaranteed IBs
2. Audit Programs Used for On-Site Visits of Branch Offices/GIBs
3. Audit Reports Issued to Branch Offices/GIBs in the Past 2 Years
4. Schedule of Branch Office/GIB Audits
5. Reports Issued to Firm/Branch Offices/GIBs by Other Regulators
6. Customer Complaint File
7. List of Disciplinary Actions Taken Against APs

Trading Activity

1. List of Proprietary and Non-Customer Accounts
2. Proprietary and Non-Customer Monthly Carrying Broker Statements (specific accounts to be selected during fieldwork)
3. Written Authorization for APs Allowed to Trade at Other Clearing Firms
4. Monthly Carrying Broker Statements/Order Tickets for APs Allowed to Trade at Other Firms

5. Recent Equity Run
6. Monthly/Daily Carrying Broker Statements for AP Discretionary Accounts (specific accounts to be selected during fieldwork)
7. Monthly Carrying Broker Statements for Firm Error Accounts
8. Commission Payout Records
9. Monthly Carrying Broker Statements for Customers (specific accounts to be selected during fieldwork)
10. Large Trader Reports/List of Customers that Trade Reportable Positions

CPO Disclosure Document

1. Most Recent Disclosure Document Provided to Potential Customers
2. Monthly Carrying Broker Statements for the Pool
3. NFA and/or CFTC Comment Letters Received for Disclosure Document
4. Supporting Documentation for Performance Listed in the Disclosure Document
5. Notice of Intended Offering
6. Records of Investments of Pool Assets
7. Performance Data Subsequent to Information Reported in the Most Recent Disclosure Document
8. Trading Records

CTA Disclosure Document

1. Most Recent Disclosure Document Used to Solicit Potential Customers
2. NFA and/or CFTC Comment Letters Received
3. Trading Records
4. Performance Record Supporting Documents

Affiliates

1. Firm Organizational Chart
2. General Ledger/Cash Receipts/Disbursements Journal
3. Reports from Other Regulatory Agencies Issued to Affiliates
4. Minutes to Board of Director's Meetings
5. List of Current Intercompany Receivables/Payables
6. Agreement with Affiliate(s) if Expenses are Paid by or on behalf of the Affiliate

Subsequent Review

1. Check Register for Operating Account [audit date through current date]
2. Unpaid Invoice File
3. General Ledger [audit date through current date]
4. Journal Entries [audit date through current date]
5. Cash Disbursements and Cash Receipts [audit date through current date]
6. Bank Reconciliations and Bank Statements [audit date through current date]
7. Legal Expense Files for All Attorneys

CPO Financial Reporting

1. Most Recent Pool Account Statement
2. General Ledger [last six months]
3. Monthly Carrying Broker Statements for the Pool [audit date and prior month]
4. Balance Sheet [audit date]
5. Bank Reconciliations and Bank Statements [audit date]
6. Cash Receipts/Disbursements Journal and Unpaid Invoice File for Pool [subsequent to audit date]
7. Account Statements [last PFS to current]
8. Participant Subsidiary Ledger
9. Fees Worksheets and/or Invoices
10. Most Recent PFS

Seldom Seen Issues

1. List of Deliveries of Futures Contracts and Agreements Addressing Collateral and Interest
2. List of Inventory with Market Value and Capital Charge Calculations
3. List of Purchase and Sale Commitments, Written Agreements, and Market Value and Capital Charge Calculations
4. Supporting Documents for Hypothetical or Extracted Performance