

NY FORM CADV
(Rev. 5/18)
STATE OF NEW YORK
Office of the Attorney General
INVESTOR PROTECTION BUREAU

**** File No.** _____
(for renewals only)

COMMODITY INVESTMENT ADVISOR STATEMENT
(Section 359-e(14) Gen. Bus. Law)
PART I. BACKGROUND OF ADVISOR

1. Name of Advisor:

a. State full name of advisor: _____

b. State trade names or publication names used by advisor:

2. Principal place of business of advisor is at _____

(Zip) _____. It has been at this location for _____ years and does does not share this space with any other entity. (If space shared, indicate with whom on separate sheet). The telephone number at this location is () _____ which number is is not shared with any other entity. (If shared, state details on separate sheet).

3. The advisor does does not maintain other offices or facilities. If it does, state where.

4. Is advisor engaged in any business or profession, directly or indirectly, other than that of a commodity investment advisor? yes; no. Describe the nature of each such other business and state what the principal business of the commodity advisor is on a separate sheet. If the principal business is other than that of a commodity investment advisor, the balance of the questions need be answered only as they relate to the commodity advisor portion of such business.

5. The advisor is a corporation; partnership; sole proprietorship; organized under the laws of _____ on (date)

_____.

6. Has the commodity advisor acquired, merged, or otherwise succeeded to the business of another commodity investment advisor within the last five years? yes no. If yes, provide details.

Filing Fee Enclosed as Follows:
ommodity Investment Advisor
Statement \$100

Please indicate to whom you wish
the fee receipt sent.
() Attorney () Firm

Personal checks not accepted.
Attorney's check, bank check,

Send remittance to:
Investor Protection Bureau,

certified check, money order
only, payable to the NYS
Office of the Attorney General

NYS Office of the Attorney General
28 Liberty Street, 15th Floor
New York, NY 10005

** Found on the fee receipt you received for original filing.

7. Has the advisor, within the last five years, discontinued business, changed its name or merged with another company? yes no. If yes, provide details.

8. The following is a complete list of the names and equity interests of all officers, directors, principals, partners, managers, supervisors or any 10% or more equity holder. For each person listed, submit form CI-1.

9. The advisor is is not registered with the SEC as an Investment Advisor. If registered, the advisor does; does not use the title "Investment Counsel" under Section 208 (c) of the Federal Investment Act of 1940.

10. The advisor is is not registered with the CFTC.

11. The commodity investment advisor is licensed or registered to do business as such in the following states:

PART II. BACKGROUND OF PRINCIPALS AND EMPLOYEES

12. State whether any individual named in Questions 8 or 9, or any entity in which such individual was a principal has ever:

A. been suspended or expelled from membership in any securities or commodities exchange, association of securities or commodities dealers or investment or commodities trading advisors or counsel? Yes No

B. had a license or registration as a securities or commodity dealer, broker, investment advisor, salesperson, futures commission merchant, associated person, commodity pool operator or commodity trading advisor denied, suspended, revoked, cancelled or refused? Yes No

C. been enjoined or restrained by any court or government agency from:

1. the issuance, sale or offer for sale of securities or commodities? Yes No

2. rendering securities or commodities advice or counsel? .Yes No

3. handling or managing trading accounts?Yes No

4. continuing any practices in connection with securities commodities Yes No

D. Is any action or proceeding seeking the relief enumerated in A - C presently

pending? Yes [] No []

E. been convicted of any crime?Yes [] No []

F. used or been known by any other name? Yes [] No []

G. been the subject of any professional disciplinary proceeding?..... Yes [] No []

H. been adjudged a bankrupt or made a general assignment for benefit of creditors; been the subject of a receivership or bankruptcy proceeding; been an officer, director, principal, partner, manager, supervisor or any 10% or more equity holder of any entity which was reorganized in bankruptcy, adjudged a bankrupt or made a general assignment for benefit of creditors?Yes [] No []

I. has a judgment entered against them or it which is presently unsatisfied? (Not including judgments involving domestic relations.) Yes [] No []

J. been a party in any litigation or administrative proceeding in which it is alleged that they or it committed fraud or otherwise violated any provision of the Martin Act or any other securities laws ? Yes [] No []

K if any answer to any of the above is "YES", attach statement of full particulars.

13. As of the date of this statement, the advisor has approximately _____ clients located in New York State.

14.

a. Does the advisor make specific recommendations or assign ratings on securities or commodities [] yes; [] no.

b. Does the advisor give advice to clients as to the investment of funds on the basis of analysis of the individual needs of the clients? [] yes; [] no.

c. Does the advisor issue periodic publications on a subscription basis? [] yes; [] no.

d. Does advisor issue special reports or analysis? [] yes; [] no.

e. What are the general methods of commodities analysis by the advisor? Indicate the importance of each.

f. What are the principal sources of information for the advisor's research? Indicate the importance of each.

g. To what extent and how does the advisor verify or test the accuracy of externally provided information and data?

h. How many advisory services does the advisor subscribe to (on either a paid or exchange basis)? _____

i. Does advisor publish and maintain a list of recommended or rated commodities? [] yes; [] no. If yes: What is the approximate size of such list? _____. How frequently does advisor add to, delete from, or review such recommended or rated list? _____. What is the maximum length of time a recommendation or

rating can be so listed without a comprehensive, mandatory review?

j. Set forth a schedule of the advisor's fees and charges; attach a sample form of contract, if any.

15. Does advisor or any person named herein have discretionary authority to make any of the following determinations without obtaining the consent of the client before the transaction is effected?

- a. Whether the transaction is to be one of purchase or sale yes; no.
- b. Which commodity is to be bought or sold yes; no.
- c. The total amount of the commodity to be bought or sold yes; no.

16. Does advisor or any person named herein have custody or possession, or authority to obtain custody or possession of:

- a. Commodities or commodity contracts of any clients yes; no.
- b. Funds of any client yes; no.

17. Does advisor's business consist of or include any type of investment advisory service not described above? yes; no.

If Yes, on a separate sheet describe in detail any other type of investment advisory service performed and the basis of recommendations made.

18. Does advisor:

- a. As principal, sell commodities to or buy commodities from any clients to whom it has recommended such purchase or sale? yes; no.
- b. As a broker (agent) for any person other than the client, sell commodities to or buy commodities from any client to whom it has recommended such purchase or sale? yes; no.
- c. Recommend the purchase or sale of any commodities sold by any company wherein the advisor or any person named herein has an ownership position in the company greater than 1% yes; no.
- d. Or any person named herein receive direct or indirect compensation or other benefits contingent upon the recommendation of a particular commodity? yes; no.

19. Does advisor have agreements or understandings either written or oral, with broker-dealer, which would require a client to transfer their account(s) to said broker-dealer? yes; no. If yes, name broker and set forth the agreements.

PART IV: OTHER INFORMATION

20. The person to contact with respect to legal matters relating to this application is _____ . Telephone: () _____ .

21. All other matters relating to this application should be referred to

Telephone () _____.

22. The advisor's fiscal year ends

_____.

Dated: _____ **Signature** _____

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

_____, being duly sworn, deposes and says
that I am the _____ (Title) of Registrant and I signed the above
form. I have read the questions and answers and information supplied, and they are true,
accurate and complete.

(Signature of Affiant/Chief
Executive Officer of Registrant)

Sworn to before me this
day of _____, 19

(Notary signature and legible official stamp)