

NinjaTrader Clearing, LLC
(d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

FINANCIAL STATEMENTS
AND
INDEPENDENT AUDITORS' REPORT

December 31, 2021

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RSM US LLP

Report of Independent Registered Public Accounting Firm

To the Member and the Board of Directors of NinjaTrader Clearing, LLC

Opinion on the Financial Statement

We have audited the accompanying statement of financial condition of NinjaTrader Clearing, LLC and Subsidiaries (d/b/a TransAct Futures, f/k/a York Business Associates, LLC) (the Company) as of December 31, 2021, and the related notes. In our opinion, the financial statement presents fairly, in all material respects, the financial position of the Company as of December 31, 2021, in conformity with accounting principles generally accepted in the United States of America.

Basis for Opinion

This financial statement is the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statement based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB and in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement, whether due to error or fraud. The Company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. As part of our audit we are required to obtain an understanding of internal control over financial reporting but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion.

Our audit included performing procedures to assess the risks of material misstatement of the financial statement, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statement. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statement. We believe that our audit provides a reasonable basis for our opinion.

Supplemental Information

The supplementary information contained in Schedules I, II, III and IV (the Supplemental Information) has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The Supplemental Information is the responsibility of the Company's management. Our audit procedures included determining whether the Supplemental Information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the Supplemental Information. In forming our opinion on the Supplemental Information, we evaluated whether the Supplemental Information, including its form and content, is presented in conformity with 17 C.F.R. § 1.10. In our opinion, the supplementary information contained in Schedules I, II, III and IV is fairly stated, in all material respects, in relation to the financial statements as a whole.

Critical Audit Matters

The critical audit matters communicated below are matters arising from the current period audit of the financial statement that were communicated or required to be communicated to the audit committee (or Equivalent Body) and that: (1) relate to accounts or disclosures that are material to the financial statement and (2) involved our especially challenging, subjective or complex judgments. The communication of critical audit matters does not alter in any way our opinion on the financial statement, taken as a whole, and we are not, by communicating the critical audit matters below, providing separate opinions on the critical audit matters or on the accounts or disclosures to which they relate. We determined that there are no critical audit matters.

RSM US LLP

We have served as the Company's auditor since 2021.

Chicago, Illinois
February 28, 2022

STATEMENT OF FINANCIAL CONDITION

December 31, 2021

Assets

Cash	\$	2,686,710
Cash segregated under Federal and other regulations		187,156,998
Receivable from clearing broker		10,293,997
Receivable from customers		16,250
Property, plant and equipment, net of accumulated depreciation of \$439,236		57,736
Capitalized Software, net of accumulated depreciation of \$29,162		495,739
Prepaid expenses and other assets		62,738
		<hr/>
Total assets	\$	200,770,168
		<hr/>

Liabilities and member's equity

Liabilities		
Payable to customers	\$	187,069,714
Accounts payable, accrued expenses and other liabilities		3,740,298
		<hr/>
Total liabilities		190,810,012
		<hr/>
Member's equity		9,960,156
		<hr/>
Total liabilities and member's equity	\$	200,770,168
		<hr/>

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

1. Nature of operations and summary of significant accounting policies

Nature of Operations

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC) ("The Company") was formed as a limited liability company under the laws of the State of Delaware in January 1998. Effective May 29, 2002, the Company was registered as a futures commission merchant ("FCM") with the Commodity Futures Trading Commission ("CFTC") and is a member of the National Futures Association ("NFA"). The Company engages in the execution of futures contracts for customers located primarily in the United States and abroad, including South America, Europe, Africa, Asia, and Australia. NinjaTrader Clearing is a fully owned subsidiary of NinjaTrader Group, LLC ("NTG").

Government and Other Regulation

The Company's business is subject to significant regulation by governmental agencies and self-regulatory organizations. Such regulation includes, among other things, periodic examinations by these regulatory bodies to determine whether the Company is conducting and reporting its operations in accordance with the applicable requirements of these organizations.

Basis of Presentation

The financial statements have been prepared in conformity with accounting principles generally accepted in the United States of America ("GAAP") as detailed in the Financial Accounting Standards Board's ("FASB") Accounting Standards Codification ("ASC").

Revenue from Contracts with Customers

Revenue from contracts with customers is recognized when, or as, the Company satisfies its performance obligations by transferring the promised services to the customers. A service is transferred to a customer when, or as, the customer obtains control of that service. A performance obligation may be satisfied at a point in time or over time. Revenue from a performance obligation satisfied at a point in time is recognized at the point in time that the Company determines the customer obtains control over the promised service. Revenue from a performance obligation satisfied over time is recognized by measuring the Company's progress in satisfying the performance obligation in a manner that depicts the transfer of the services to the customer. The amount of revenue recognized reflects the consideration the Company expects to receive in exchange for those promised services (i.e., the "transaction price"). In determining the transaction price, the Company considers multiple factors, including the effects of variable consideration, if any.

The Company's revenues from contracts with customers are recognized when the performance obligations are satisfied at an amount that reflects the consideration expected to be received in exchange for such services. The majority of the Company's performance obligations are satisfied at a point in time and are typically collected from customers by debiting their brokerage account with the Company.

Commissions and exchange fees are charged to customers for order execution services and trade clearing and settlement services. These services represent a single performance obligation as the services are not separately identifiable in the context of the contract. The Company recognizes revenue at a point in time at the execution of the order (i.e., trade date). Commissions and exchange fees are generally collected from cleared customers on trade date. Inactivity Fees are charged to customers when an account is inactive. The Company recognizes revenue monthly as the performance obligation is satisfied at a point in time by servicing customer accounts that are inactive in a given month.

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

Commission and fee revenue are recognized on a trade date basis.

Accounts receivable balances at January 1, 2021 and December 31, 2020 related to revenue from contracts with customer are below. The increase in net Accounts receivable from customers is due to a decrease in allowance for uncollectable accounts.

	1/1/2021	12/31/2021
A/R from contracts with customers	<u>\$2,552</u>	<u>\$16,250</u>

Securities and Derivative Financial Instruments

Transactions in securities and derivative financial instruments are recorded on trade date and recorded at fair value, with unrealized gains and losses reflected in the consolidated statement of income included in other revenue. Interest is recognized on the accrual basis.

Translation of Foreign Currency

Assets and liabilities denominated in foreign currencies are translated into United States dollar amounts at the year-end exchange rates. Transactions denominated in foreign currencies are translated into United States dollar amounts on the transaction date. Adjustments arising from foreign currency transactions are reflected in the consolidated statement of income.

Income Taxes

The Company is treated as a disregarded entity for federal income tax purposes, in accordance with single member limited liability company rules. All tax effects of the Company's income or loss are passed through to the member. Therefore, no provision or liability for federal income taxes is included in the financial statements.

Use of Estimates

The preparation of financial statements in conformity with GAAP in the United States of America requires the Company's management to make estimates and assumptions that affect the amounts disclosed in the financial statements. Actual results could differ from those estimates.

Software Development Costs

In compliance with ASC 350-40, Internal Use Software, the Company capitalized and carries forward as assets, the cost to develop internal use software. The Company capitalized development costs to modernize the client onboarding process and improve the ongoing user experience. During the application development stage, management capitalizes, as long-lived assets, certain costs incurred up until the point at which the software is substantially complete and ready for release. The company began capitalizing development costs on February 1, 2021 and ceased capitalization on October 31, 2021. The Company recorded \$524,900 of capitalized expenditures during the application development stage. The internal use software has an estimated useful life of 3 years. The Company began amortizing the asset in November 2021.

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

Recent Accounting Pronouncements

In February 2016, the FASB issued ASU 2016-02, Leases, which supersedes the guidance in ASC 840, leases. The new standard requires lessees to apply a dual approach, classifying leases as either finance or operating leases based on the principle of whether or not the lease is effectively a financed purchase by the lease. The new standard is effective for private entities for fiscal years beginning after December 15, 2021. As of January 1, 2022 the company is adopting the standard using the practical expedient approach. At December 31, 2021, had the Company adopted the standard, the right of use asset is \$158,838 and corresponding lease liability is \$178,297 net of all prior deferred rent. Management determined the discount rate using the risk-free rate from the US Department of Treasury as of the transition date.

2. Funds Segregated or Held in Separate Accounts under Federal Regulations

On December 31, 2021, assets segregated or held in separate accounts under the Commodity Exchange Act included in the consolidated statement of financial condition are as follows:

Cash	\$ 187,156,998
Receivable from clearing broker	10,022,894
	<u>\$ 197,179,892</u>

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

3. Valuation of Investments at Fair Value

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability (i.e., the “exit price”) in an orderly transaction between market participants at the measurement date.

In determining fair value, the Company uses various valuation approaches. ASC 820, “Fair Value Measurements and Disclosures” establishes a fair value hierarchy for inputs used in measuring fair value that maximizes the use of observable inputs and minimizes the use of unobservable inputs by requiring that the most observable inputs be used when available. Observable inputs are those that market participants would use in pricing the asset or liability based on market data obtained from sources independent of the Company.

Unobservable inputs reflect the Company’s assumptions about the inputs market participants would use in pricing the asset or liability developed based on the best information available in the circumstances. ASC 820 requires use of a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value into three broad levels: quoted market prices in active markets for identical assets or liabilities (Level 1); inputs other than quoted market prices that are observable for the asset or liability, either directly or indirectly (Level 2); and unobservable inputs for an asset or liability (Level 3).

ASC 820 did not have a material impact on the Company’s financial statements. At December 31, 2021, all of the Company’s investments are considered Level 1 financial instruments.

The following table presents the Company’s fair value hierarchy for those assets measured at fair value on a recurring basis as of December 31, 2021:

<u>Assets</u>	<u>Level 1</u>	<u>Level 2</u>	<u>Level 3</u>	<u>Total</u>
Securities Owned				
U.S. Treasury obligations - Treasury bills	\$ -	\$ -	\$ -	\$ -
U.S. Treasury obligations - Treasury bonds	-	-	-	-
Receivables from clearing broker				-
Net unrealized gain (loss) on open futures contracts	(205,184)	-	-	(205,184)
Total assets	<u>\$ (205,184)</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ (205,184)</u>

4. Receivable from clearing broker

Amounts due from clearing broker consist of cash balances and unrealized gains and losses on open commodity futures contracts. Cash and financial instruments held at the Company’s broker collateralize amounts due to broker, if any, and may serve to satisfy regulatory or margin requirements.

Cash	\$ 10,499,181
Net unrealized gain (loss) in open futures contracts	(205,184)
	<u>\$ 10,293,997</u>

At December 31, 2021, cash balances of approximately \$10,499,181 serve to satisfy margin requirements of approximately \$3,790,054.

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

5. Derivative contracts

In the normal course of business, the Company utilizes derivative contracts in connection with its trading activities. Investments in derivative contracts are subject to additional risks that can result in a loss of all or part of an investment. The Company's derivative activities are primarily used to manage foreign currency and interest rate fluctuations. These derivative contracts are recorded on the consolidated statement of financial condition in receivable from a clearing broker and the related realized gain(loss) associated with these derivatives is recorded in the consolidated statement of income in other revenue. In addition to its primary underlying risks, the Company is also subject to additional counterparty risk due to inability of its counterparties to meet the terms of their contracts.

At December 31, 2021, the volume of the Company's derivative activities based on their notional amounts and number of contracts, categorized by primary underlying risk and the fair value of the derivative instruments do not have a material impact on the consolidated statement of income or the consolidated statement of financial condition.

6. Extinguishment of Paycheck Protection Program Debt

In 2020, the Company received a loan from BMO Harris Bank, N.A. under the federal Paycheck Protection Program (PPP) established by the Coronavirus Aid, Relief and Economic Security (CARES) Act. The Company received loan proceeds of \$460,407. The loan is subject to a note dated April 15, 2020, bearing interest at 1% per annum with the principal balance due two years subsequent to the date of the note. As of April 15, 2021, the Company received notice from BMO Harris Bank that \$454,407 was forgiven, leaving a balance of \$6,396 which was paid in full on April 30, 2021.

7. Net capital requirement

As an FCM, NinjaTrader Clearing is subject to the net capital requirements under Regulation 1.17 of the Commodity Exchange Act. Under these provisions, the Company is required to maintain minimum net capital, as defined, of the higher of \$1,000,000, or the sum of 8 percent of customer and 8 percent of non-customer risk maintenance margin requirements on all positions. Adjusted net capital and risk maintenance margin requirements change from day to day. At December 31, 2021, the Company had a net capital requirement of \$1,000,000 and adjusted net capital of \$9,179,976 or an excess of \$8,179,976. At December 31, 2021, the Company was in compliance with these capital requirements. The net capital requirements could effectively restrict the payment of cash distributions, the making of unsecured loans to its owners or affiliates and the purchase by the Company of its own membership interests.

8. Off balance sheet risk and concentration of credit risk

Customer activities

In the normal course of business, the Company executes transactions for the accounts of its customers. These activities may expose the Company to off balance sheet risk in the event the customer is unable to fulfill its contracted obligations and the Company has to purchase or sell the financial instrument underlying the contract at a loss.

The customer's transactions are cleared through a clearing broker. Futures contracts are commitments to either purchase or sell a commodity at a future date for a specified price and may be settled in cash or through delivery of the underlying financial instrument. Margin deposit requirements required to enter into such contracts are generally small in value in comparison to the gross value of the underlying futures contract. Margin is a good faith deposit from the customer that reduces the risk to the Company of failure by the customer to fulfill obligations under these contracts. To minimize exposure to risk due to market variation, the Company requires customers to maintain margin

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

collateral in compliance with various regulatory and internal guidelines. The Company monitors required margin levels on a daily basis and pursuant to guidelines require customers to deposit additional collateral or to reduce or liquidate positions when necessary. The Company believes that collateral held at December 31, 2021, was adequate to minimize the risk of material loss that could be created by customer positions held at that time.

Credit risk

Credit risk arises from the potential inability of a customer or counterparty to perform in accordance with the terms of open contracts. The Company's exposure to credit risk associated with the counterparty nonperformance is limited to the current cost to replace all contracts in which the Company has a gain. Exchange-traded financial instruments, such as futures, generally do not give rise to significant counterparty exposure due to the cash settlements procedures for daily market movements or the margin requirements of the individual exchanges.

Concentration of credit risk

In the normal course of business, the Company enters into various transactions with a clearing broker, banks and other financial institutions. The Company is subject to credit risk to the extent any financial institution with which it conducts business is unable to fulfill contractual obligations on its behalf. Management monitors the financial condition of such financial institutions and does not anticipate any losses from these counterparties.

The Company maintains its cash balances in financial institutions, which at times may exceed federally insured limits. The Company has not experienced any losses in such accounts. Management believes the Company is not exposed to any significant credit risk on cash.

Foreign currency risk

The Company may be exposed to foreign currency fluctuations due to customer activities. The Company enters into futures contracts to hedge against net exposure denominated in foreign currencies. Gains and losses on these contracts are recognized in the consolidated statement of income as other revenue.

9. Receivable from and payable to customers

Receivable from customers represent the total amount of net deficit customer balances. Payable to customers represent the total amount of accounts with credit balances. Customer receivables are presented net of allowance for doubtful accounts. At December 31, 2021, the allowance for doubtful account balance was \$33,317.

10. Member's equity

As of January 1, 2021, the ownership of Infinity Futures, LLC was transferred from NinjaTrader Clearing, LLC (f/k/a York Business Associates, LLC) to its parent company, NinjaTrader Group, LLC. The reorganization was done in the form of an equity distribution.

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

11. Commitments and contingent liabilities

The Company leases office space under non-cancelable operating lease expiring September 30, 2024. The lease requires the Company to pay its proportionate share of real estate taxes and direct cost of operations, repair and maintenance and management of the building over a base amount.

The total minimum rental commitments at December 31, 2021, under these leases are as follows:

<u>Year</u>	<u>Amount</u>
2022	64,187
2023	66,080
2024	50,703
Total minimum lease payments	<u>\$ 180,970</u>

The Company's leases agreements require security deposits of \$8,355 which are included in other assets on the consolidated statement of financial condition.

12. Indemnifications

In the normal course of business, the Company enters into contracts that contain a variety of representations and warranties that provide indemnifications under certain circumstances. The Company's maximum exposure under these arrangements is unknown and the risk of loss is remote, as it would require future claims that may be made against the Company that have not occurred. Management of the Company expects the risk of any futures obligations under these indemnifications to be remote.

NinjaTrader Clearing, LLC (d/b/a TransAct Futures, d/b/a NinjaTrader, f/k/a York Business Associates, LLC)

NOTES TO FINANCIAL STATEMENTS

13. Related party transactions

As stated in section 1, the Company is owned by NinjaTrader Group, LLC. The parent company provides certain services to the Company related to payroll and other administrative services. Accounts Payable, accrued expense and other liabilities at December 31, 2021 includes \$14,380 due to the Parent for payroll and other administrative services.

The Company is an affiliate of a registered Independent Introducing Broker (IIB) and shares in the overhead expenses related to shared services under Section 8 of the IIB Agreement. The Company earned commissions from customers introduced by affiliate. The Company paid affiliate commissions and various fees based on contractual agreements, for customers introduced by affiliate. Accounts payable at December 31, 2021 includes \$2,832,192 due to affiliate for commissions and fees.

The Company was an affiliate of a separate registered Independent Introducing Broker (IIB) than referenced above. The company earned commissions from customers introduced by affiliate, and paid affiliate commissions from customers introduced by affiliate through June 30, 2021. The affiliate unregistered its IB status with the NFA as of June 30, 2021.

The Company is an affiliate of a software development company and shares in the overhead expenses related to shared services under an expense sharing agreement. The Company capitalized \$135,222 in shared overhead costs related to the development of internal use software discussed in section 1. Accounts payable at December 31, 2021 includes \$136,249 due to affiliate.

The Company utilizes software under a license service agreement with an entity affiliated through common ownership. For the year ended December 31, 2021, the Company did not pay any amount to this affiliated under this agreement.

Accounts Payable at December 31 includes \$3,046,789 due to affiliates for commissions and fees, and payroll and other administrative services.

14. Subsequent events

These financial statements were approved by management and available for issuance on February 28, 2022. Subsequent events have been evaluated through this date. There were no subsequent events requiring disclosures and or adjustments except for the transaction described below.

SUPPLEMENTAL INFORMATION

December 31, 2021

**Schedule I
Computation of Net Capital and Minimum Capital Requirements**

Total assets reflected in consolidated statement of financial condition		\$ 200,770,168
Less: Non-current assets included in total assets		
Property, plant and equipment, net	(57,736)	
Capitalized Software, net	(495,739)	
Prepaid and other assets - noncurrent portion	<u>(62,737)</u>	
		<u>(616,212)</u>
Current assets, as defined		<u>200,153,956</u>
Total liabilities reflected in consolidated statement of financial condition		190,810,012
Long term debt pursuant to regulation 1.17(c)(4)(vi)	<u>-</u>	
Liabilities, as defined		<u>190,810,012</u>
Net capital		<u>9,343,944</u>
Charges against net capital:		
Twent percent (20%) of uncovered inventories	\$ 119,170	
Charges against U.S. Treasury Obligations	-	
Charges against open commodity positions in proprietary accounts	<u>44,798</u>	
Total charges against net capital		<u>163,968</u>
Adjusted net capital		<u>9,179,976</u>
Net capital required using the risk-based requirement - the greater of:		
Amount of customer risk maintenance margin	<u>\$ 3,760,189</u>	
8% of margin		<u>300,815</u>
Amount of noncustomer risk maintenance margin	<u>\$ -</u>	
8% of margin		<u>-</u>
Total		<u>300,815</u>
Minimum dollar amount requirement		<u>1,000,000</u>
Amount required		<u>1,000,000</u>
Excess net capital		<u>\$ 8,179,976</u>

There are no material differences between the above computation and NinjaTrader Clearing's corresponding unaudited Form 1-FR-FCM filing.

There are no material differences between NinjaTrader Clearing's audited and unaudited Statement of Financial Condition at December 31, 2021

SUPPLEMENTAL INFORMATION

December 31, 2021

**Schedule II
Statement of Segregation Requirements and Funds in
Segregation for Customers Trading on U.S. Commodity Exchanges and for
Customers' Dealer Options Accounts**

Segregation Requirements (Section 4d(2) of the CEAct)

Net ledger balance, as follows:

Cash	\$ 184,595,530
Securities (at market)	-
Net unrealized profit (loss) in open futures contracts traded on a contract market	(175,191)
Exchange traded options, as follows:	
Market value of open option contracts purchased on a contract market	-
Market value of open option contracts granted (sold) on a contract market	-
Net equity	<u>184,420,339</u>
Accounts liquidating to a deficit and accounts with debit balances - gross amount	49,567
Less amount offset against U.S. Treasury obligations	-
Amount required to be segregated	<u>\$ 184,469,906</u>

Funds in Segregated Accounts

Deposited in segregated funds bank accounts, as follows:

Cash	\$ 184,147,389
Securities representing investments of customer's funds (at market)	-
Securities held for particular customers or option customers in lieu of cash (at market)	-
Margins on deposit with clearing organizations of contract markets, as follows:	
Cash	-
Securities representing investments of customers' funds (at market)	-
Securities held for particular customers or option customers in lieu of cash (at market)	-
Net settlement from (to) clearing organizations of contract markets	-
Exchange traded options, as follows:	
Value of open long option contracts	-
Value of open short option contracts	-
Net equities with other FCM's as follows:	
Net liquidating equity	9,519,491
Securities representing investments of customers' funds (at market)	-
Securities held for particular customer or options customers in lieu of cash (at market)	-
Segregated funds on hand	-
Total amount in segregation	<u>\$ 193,666,880</u>
Excess funds in segregation	<u>\$ 9,196,974</u>
Target amount excess funds in segregation	<u>4,000,000</u>
Excess funds in segregation over target amount excess	<u>\$ 5,196,974</u>

There are no material differences between the above computation and NinjaTrader Clearing's corresponding unaudited Form 1-FR-FCM filing.

**Statement of Segregation Requirements and Funds
in Segregation of Customers' Dealer Option Accounts**

The Company does not carry customers' dealer options accounts as defined by Commodity Exchange Act Regulation 32.6

SUPPLEMENTAL INFORMATION

December 31, 2021

**Schedule III
Statement of Secured Amounts and Funds Held in Separate
Accounts for Foreign Futures and Foreign Option Customers
Pursuant to Commission Regulation 30.7**

Net ledger balance - cash	\$	2,612,661	
Net unrealized profit (loss) in open futures contracts traded on a foreign board of trade		(12,854)	
Net equity(deficit)		2,599,807	\$
Accounts liquidating to a deficit and accounts with debit balances - gross amount		-	
Amounts to be set aside in separate Section 30.7 account		2,599,807	\$
Funds on deposit in separate Section 30.7 accounts:			
Cash in banks - located in the United States		3,009,609	
Securities - in safekeeping with banks located in the United States		-	
Equities with registered futures commission merchants:			
Cash	\$	516,257	
Unrealized gain (loss) on open futures contracts		(12,854)	
		503,403	
Amounts held by clearing organizations of foreign boards of trade		-	
Amounts held by members of foreign board of trade - cash and unrealized gain (loss) on futures contracts		-	
Total funds in separate Section 30.7 accounts		3,513,012	\$
Excess funds in separate Section 30.7 accounts		913,205	\$
Target amount for excess funds in separate 30.7 accounts		400,000	
Excess funds in separate 30.7 account over target excess		513,205	\$

There are no material differences between the above computation and NinjaTrader Clearing's corresponding unaudited Form 1-FR-FCM filing.

SUPPLEMENTAL INFORMATION

December 31, 2021

Schedule IV
Statement of Cleared SWAPS Segregation Requirements and
Funds in Cleared SWAPS Customer Accounts Under 4D(F) of the CEA

Amount required to be segregated for cleared swaps customers	\$ -
Total amount in cleared swaps customer segregation	-
Excess funds in segregation	\$ -
Target amount for excess funds in cleared swaps segregated accounts	-
Excess funds in cleared swaps customer segregation over target excess	\$ -

There are no material differences between the above computation and TransAct's corresponding unaudited Form 1-FR-FCM filing.