Gentlemen ,

Please find a detailed description of the TradingMotion platform attached herein. Attain is in the process of signing agreements with various FCMs and IBs to white label this platform for their websites, and desires to have the NFA fully aware of how the platform operates, who the players are, and how the order flow and money flow works.

The following items have been previously discussed with NFA, and we are seeking confirmation that NFA sees no issues with these items, as well as the operation and layout of the platform overall.

You can access a beta version of the platform to test the functionality, see disclaimers and disclosures, etc. here: http://attain.tradingmotion.com/ and we have created several test logins for you:

User   Pass

DEMO15	8243
DEMO16	1589
DEMO17	3986
DEMO18	5958

Items previously discussed:

1. The IBs or FCMs white labeled version of the platform will be considered their promotional material - and they will be responsible for insuring it is not misleading or otherwise violating NFA rules.

2. The IBs and FCMs can use the tools and reports provided by TradingMotion on the website and by Attain upon request as their support for the promotional material and to meet their general review and supervision requirements, including support for insuring the hypothetical trade prices shown are not materially different than what is being achieved by clients and that the combined performance for a client as shown on the platform is not materially different than what is shown on their monthly statement.

3. As long as is all properly disclosed - there are no problems with Attain invoicing FCMs for fees due from clients for trading software accessed on the platform (the $39 monthly fee to trade xyz system, for example), Attain receiving the payment from the FCM, then Attain settling up with third parties who have licensed the software to TradingMotion, either by direct payment or payment to TradingMotion.

4. the platform can operate at the FCM level via a user agreement, and need not be 'letter of direction' based, as it is customer driven and customer operated with the customer choosing which models to trade, when to trade them, and when to start/stop; and there is no broker involvement (no broker placement of trades)

5. Attain has the responsibility to supervise the platform and TradingMotion's operation of it to insure compliance with NFA interpretive Notice 90-46 (http://www.nfa.futures.org/nfamanual/NFAManual.aspx?RuleID=9046&Section=9) But end users of the platform (IBs and FCMs) will not have this responsibility, as it will merely be an offered platform, and not something they are involved with in terms of operation or the order flow/connection to exchanges, etc.

TradingMotion Software/Platform Regulatory Review

How it works on Backend:

1. TradingMotion platform is not a standalone Order Routing System. The TradingMotion platform sits 'on top of' the CQG, CTS, or OEC Direct API ("Direct ORS") , sending orders via those order routing systems.

2. The TradingMotion platform sends orders via the Direct ORS API by logging into the Direct ORS FIX API via a 'superuser' provided by the FCM, then authenticating each TradingMotion user on the TradingMotion platform.

3. From this super-user we get trading rights on all the accounts that have been enabled by the FCM. The FCM still has full control over which accounts the super-user can access. So when they enable an account for the TradingMotion platform, they will need to add that account on the super-user, and remove it when they want to disable TradingMotion platform for each particular user (the same process is done by the FCM when enabling an account for CQG or TT, etc).

4. Via the Direct ORS API, using the FIX protocol messaging, TradingMotion can:
   a. Send new orders (FIX message type D)
   b. Modify existing orders (FIX message type G)
   c. Cancel existing orders (FIX message type F)
   d. Get fill notifications (FIX message type 8)
   e. Get real-time account balance info for doing the balance based risk control (FIX message types UAR & UAP)
   f. You can see detailed info of these messages at https://develop.cqg.com/qd/documents/CQG%20FIX%20API%20Specification.pdf)

5. When a system order is calculated on the TradingMotion platform:
   a. We validate the signal to confirm it's compliant with what the system is expected to do. *(Systems are typically restricted to trade just one product, during certain timeframe, open a maximum open positions, etc., so if a system which is only supposed to trade 1 contract per signal tried to place 3 contracts, the confirmation would fail and no order would be placed.)*
   b. If the signal is confirmed OK, we check how many clients have that system active on our platform and send the system signal (i.e buy at limit price xxx) to the exchange via the Direct ORS API, *for each client individually.* Each client trading a system will get the same signal sent for their individual account.
   c. Each fill happens on each particular account. There is no block trading or post tradeallocation.

d. We show real time information of all orders and fills for each client under their login on the TradingMotion platform.

6. The TradingMotion platform uses the Direct ORS risk protocols. Example, if CQG is setup to not allow more than 3 contracts be placed at a time – an order sent from TradingMotion via the CQG API via to buy/sell 5 contracts would be 'rejected' by CQG, and in turn shown to customer as an invalid order.

How it works with the FCM:

7. A customer of an FCM/IB wishing to use the TradingMotion platform will have to request access from the FCM/IB.

8. The FCM/IB will then have to:
    a. create a unique, funded futures account for customer
    b. add that account to the Direct ORS superuser for TradingMotion (allowing for placing of orders through the API for that account)
    c. Setup the account's margin% and commission levels to the levels detailed on each individual trading system

9. Once the FCM/IB setup is complete, the FCM/IB will submit a new user request to TradingMotion/Attain via email or an online portal to create a username/password on the white labeled site, and the TradingMotion login credentials will be emailed to the customer

10. The FCM will sign an agreement with Attain, as the official distributor of the TradingMotion platform in the US, to pay a platform fee equal to $1.50, $2, or $2.50 (depending on the market) per contract traded through the platform to Attain
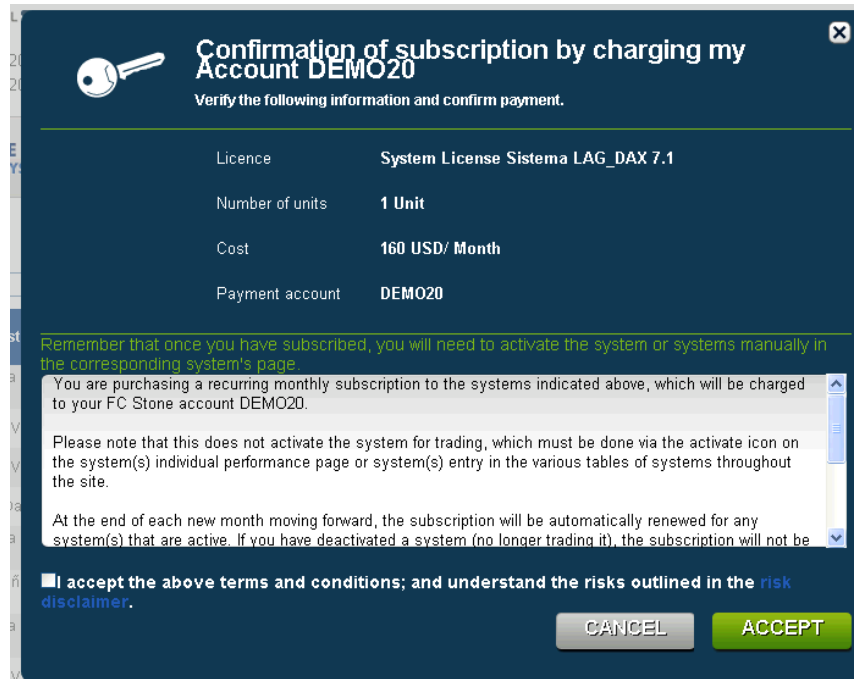
How it works with the Customer:

11. Upon login, the customer will be presented with the TradingMotion User Agreement, which among other things, describes:
    a. that TradingMotion SL own the software which runs the platform
    b. that the software is distributed in the US by Attain Capital Mgmt
    c. that Attain Capital will be paid $1.50, $2, or $2.50 (depending on the market) per contract traded on the platform
    d. that Attain Capital will invoice the FCM for any trading system license fees incurred by the user, and that customer authorizes FCM to payout these fees

12. Once the customer has a login, they can browse through dozens of different trading systems, all presented in the manner sent to NFA and reviewed without comment in 2013-CINV-635

13. Once the customer chooses a system he or she wishes to trade, they must first "purchase" a license to that system.
    a. The "purchase" of a license is nothing more than agreeing to a set monthly cost ($160/mo in this example)

    b. Upon clicking the button listing the price per month to purchase the license, a confirmation 'pop-up' appears confirming the details of the purchase for the client, and again authorizing their FCM to pay Attain upon receiving an invoice for the fees payable

Confirmation of subscription by charging my Account DEMO20

Verify the following information and confirm payment.

Licence	System License Sistema LAG_DAX 7.1
Number of units	1 Unit
Cost	160 USD/ Month
Payment account	DEMO20

Remember that once you have subscribed, you will need to activate the system or systems manually in the corresponding system's page.

You are purchasing a recurring monthly subscription to the systems indicated above, which will be charged to your FC Stone account DEMO20.

Please note that this does not activate the system for trading, which must be done via the activate icon on the system(s) individual performance page or system(s) entry in the various tables of systems throughout the site.

At the end of each new month moving forward, the subscription will be automatically renewed for any system(s) that are active. If you have deactivated a system (no longer trading it), the subscription will not be

■I accept the above terms and conditions; and understand the risks outlined in the risk disclaimer.

CANCEL   ACCEPT

c. All of the licenses purchased and active for a user's account can be viewed by the user under the 'MySYstems/Licenses' screen:

User: DEMO20
Account: DEMO20

Explore Systems | Top 10 | My Systems | Help

Systems | Fills | Orders | Licenses

My active licenses

Developer	System	Cost	Subscription date	Expiration date	Available units	Type	Manage Subscription
TradingMotion	All (25)	0 €	-	-	20 / 20	Free (-)	
AutoTradingBot	BoloniaV1 DAX 13'	72 €	07/03/2013	07/31/2013	1 / 1	FCStone account debit	Cancel
AutoTradingBot	BoloniaX4_B 15CL	40 €	07/10/2013	07/31/2013	1 / 1	FCStone account debit	Cancel
AutoTradingBot	Id 2152 - Sistema DC FDAX 9'	56 €	07/09/2013	07/31/2013	0 / 1	FCStone account debit	Cancel
Gestrading	AlfaID Dax 5'	153 €	07/03/2013	07/31/2013	1 / 1	FCStone account debit	Cancel

14. The customer can view any pending orders submitted by the system(s) they have chosen, open positions, and P/L of open and closed trades via the 'Systems', 'Fills', and 'Orders' pages.

Fills

System	Product	Date	Type	Exp	Volume	Stop Pr.	Fill Pr.	Order No.	Commission per side
Id 2152 - Sistema DC FDAX 9'	FDAX	07/18/2013 21:48:04	MKT	0913	-1	0	8329	SIM-5043944	12.5 €
Id 2152 - Sistema DC FDAX 9'	FDAX	07/18/2013 15:55:17	STP	0913	1	8304.5	8304.5	SIM-5043144	12.5 €
Id 2152 - Sistema DC FDAX 9'	FDAX	07/17/2013 21:48:01	MKT	0913	-1	0	8256	SIM-5041621	12.5 €
Id 2152 - Sistema DC FDAX 9'	FDAX	07/17/2013 14:54:02	MKT	0913	1	0	8266.5	SIM-5040713	12.5 €

15. At any time, and from any page listing systems – the customer can choose to stop trading a system, by clicking 'Stop Strategy'

St	Exp.	System	Position	Closest Order	Last Trade	P/L	Last	Today	Accum.
🟢	0913	Id 2152 - Sistema DC FDAX 9'	0	-	S 8329 (07/18/2013 21:48:04)	-			
🟢	0913	Theta3Dax 30'	0	-	S 7966 (07/08/2013 17:24:01)	-			
		FDAX	0						

FDAX - DAX Future (EUR)

- Extend License
- View Performance
- Stop Strategy
- Change Multiplier

a. Clicking 'Stop Strategy' will bring up a confirmation 'pop-up' which will ask the customer how they wish to exit any open positions (exit at market immediately, exit on the next system signal, or exit at the end of the day)

How the IB/FCM can use the platform to meet their NFA review requirements

16. The listed monthly P/L for each system is 'clickable' within the performance report, bringing up the day by day profit or loss for each specific month, allowing a reviewer or auditor to verify the daily signal results equal the listed monthly total, and in turn the annual totals, and resulting stats.

17. For further detail, a reviewer or auditor can click on the 'Trade Log', to see the specific trade prices ('Hypo Fill Price') which were generated by the system to result in the specific session's

profit or loss. These trade prices can also be downloaded to an excel file via the excel icon at the bottom left, for quick calculations from points earned/lost to dollars earned/lost.

Monthly P/L	Trade Log		Session Log		■ Backtested ■ Tracked ■ Live Trading				
Trade Time	Trade Type	Trade Volume	Open Position	Hypo Fill Price	Average	Best	Worst	Slippage	
07/10/2002 20:00:00	BUY MKT	+1	0	4229.5	-	-	-	-0.7500	
07/10/2002 10:14:00	SELL STP	-1	-1	4312.0	-	-	-	-0.7500	
07/09/2002 11:51:00	SELL STP	-1	0	4437.0	-	-	-	-0.7500	
07/09/2002 09:34:00	BUY STP	+1	+1	4513.5	-	-	-	-0.7500	
07/08/2002 14:25:00	BUY MKT	+1	0	4465.5	-	-	-	-0.7500	
07/08/2002 10:55:00	SELL STP	-1	-1	4430.5	-	-	-	-0.7500	
07/05/2002 20:00:00	SELL MKT	-1	0	4500.5	-	-	-	-0.7500	
07/05/2002 10:58:00	BUY STP	+1	+1	4393.5	-	-	-	-0.7500	
07/04/2002 16:16:00	SELL STP	-1	0	4228.0	-	-	-	-0.7500	
07/04/2002 10:54:00	BUY STP	+1	+1	4259.5	-	-	-	-0.7500	

1-10 out of 708 results   First Previous 1 2 3 4 5 Next Last

18. For trades done on actual accounts – even more detail is provided, including the 'Average' fill price for each system and trade across all TradingMotion users (across all brokers and FCMs). The best and worst price achieved across all customers is provided so clients and reviewers can test whether a client is repeatedly the worst fill. The slippage, or difference between the Hypo Fill price and 'Average' price is also listed, in points. And again, all the data can be downloaded to a spreadsheet.

Monthly P/L	Trade Log		Session Log		■ Backtested ■ Tracked ■ Live Trading				
Trade Time	Trade Type	Trade Volume	Open Position	Hypo Fill Price	Average	Best	Worst	Slippage	
07/23/2013 21:56:01	SELL MKT	-1	0	8323.0	8323.000	8323.0	8323.0	0.0000	
07/23/2013 09:53:03	BUY MKT	+1	+1	8343.0	8343.000	8343.0	8343.0	0.0000	
07/22/2013 21:56:06	SELL MKT	-1	0	8327.0	8328.000	8328.0	8328.0	1.0000	
07/22/2013 10:35:59	BUY STP	+1	+1	8356.0	8356.000	8356.0	8356.0	0.0000	
07/19/2013 21:58:01	SELL MKT	-1	0	8340.0	8333.000	8333.0	8333.0	-7.0000	
07/19/2013 11:51:10	BUY STP	+1	+1	8308.5	8308.500	8308.5	8308.5	0.0000	
07/18/2013 21:57:43	SELL MKT	-1	0	8324.5	8325.000	8325.0	8325.0	0.5000	
07/18/2013 14:15:22	BUY STP	+1	+1	8265.5	8265.500	8265.5	8265.5	0.0000	
07/17/2013 16:35:25	BUY STP	+1	0	8264.0	8264.000	8264.0	8264.0	0.0000	
07/17/2013 10:20:34	SELL STP	-1	-1	8214.0	8213.000	8213.0	8213.0	-1.0000	

1-10 out of 6,024 results   First Previous 1 2 3 4 5 Next Last

19. To protect the proprietary nature of how many users are utilizing each system and the platform in general – TradingMotion/Attain intends to provide support for the average fill price across all customers outside of the platform, meaning not readily available to any and all users online. Any user, FCMs, IB, or NFA can request the support for any average fill price on the platform, and tradingmotion/Attain will email a spreadsheet such as the following, detailing the fill prices across multiple clients, the average of which is the average price listed on the platform.

ClientFill_Time	ClientFill_Volume	**ClientFill_Price**	ClientFill_OrdNo	ClientFill_TrnNo	ExectutingFCM	ClientAccountNumber
04/05/2011 17:00:02	1	**7403.5**	03ASBY4T2	007ZPF	Interdin Bolsa, SV, SA	812784
04/05/2011 17:00:02	1	**7404**	03ASBY4T2	007ZPG	Interdin Bolsa, SV, SA	812784
04/05/2011 17:00:04	2	**7403.5**	A6657-755148	738336	Interdin Bolsa, SV, SA	ATT_PF85646-52
04/05/2011 17:00:04	2	**7404**	A6619-755147	738339	Interdin Bolsa, SV, SA	ATT_PF85670-76
	Average Price =	**7403.75**				

20. A 'Broker Portal' is provided to each IB and FCM utilizing the TradingMotion platform where they can monitor the activity and performance of all their clients utilizing the platform.

21. To review and reconcile actual client performance as seen on the client's monthly statements with what is shown on the TradingMotion platform, an IB or FCM (or auditor) can login as the client via the Broker Portal and view the 'Performance' tab, which allows the reviewer to see the daily profit and loss per market, per system, and overall on any timeframe.

| Account: T00ZF355 | | Explore Systems | Top 10 | My Systems | Help |

| | Systems | Fills | Orders | Performance | Licenses |

| Select a product ▾ | Select a system ▾ | Previous Month 06/01/2013 - 06/30/2013 ▾ |

Sessions

Date	System(s)	My start/stops	My P/L	Hypo P/L	Trading Diff	Start/Stop Diff	Conv. Rate	My Total P/L
06/03/2013	Theta3Dax 30'	3 ⊕	($536.58)	($1520.82)	$0.00	$984.24	1.3008	($536.58)
06/04/2013	2 FDAX systems	1 ⊕	($2552.94)	($138.94)	$4.09	($2418.09)	1.3092	($3089.52)
06/05/2013	AlfaID Dax 5'	2 ⊕	$1339.37	$1335.28	$0.00	$4.08	1.3067	($1750.15)

22. When selecting a specific month, the daily profit and loss for the client across all systems and months is shown under 'My P/L', with the total P/L given (in this example, $5,865.17) reconciling to the total futures profit/loss on the customer's monthly statement (with any differences being due to small differences in currency conversions, as disclosed)

| Select a product ▾ | Select a system ▾ | Previous Month 06/01/2013 - 06/30/2013 ▾ |

Sessions

Date	System(s)	My start/stops	My P/L	Hypo P/L	Trading Diff	Start/Stop Diff	Conv. Rate	My Total P/L
06/03/2013	Theta3Dax 30'	3 ⊕	($536.58)	($1520.82)	$0.00	$984.24	1.3008	($536.58)
06/04/2013	2 FDAX systems	1 ⊕	($2552.94)	($138.94)	$4.09	($2418.09)	1.3092	($3089.52)
06/05/2013	AlfaID Dax 5'	2 ⊕	$1339.37	$1335.28	$0.00	$4.08	1.3067	($1750.15)
06/06/2013	4 systems	4 ⊕	$1544.82	$2836.46	$0.00	($1291.64)	1.3118	($205.33)
06/07/2013	3 systems	5 ⊕	($2664.09)	($2846.56)	($13.26)	$195.73	1.3260	($2869.42)
06/10/2013	Theta3Dax 30'	0	($1882.28)	($1883.60)	$1.32	$0.00	1.3209	($4751.70)
06/11/2013	2 FDAX systems	0	($298.64)	($572.73)	$274.09	$0.00	1.3273	($5050.34)
06/12/2013	2 FDAX systems	0	$4912.49	$4912.49	$0.00	$0.00	1.3277	($137.85)
06/13/2013	Theta3Dax 30'	0	$3578.41	$3578.41	$0.00	$0.00	1.3315	$3440.56
06/14/2013	2 URO systems	0	$62.50	$42.25	$20.25	$0.00	-	$3503.06
06/17/2013	2 FDAX systems	2 ⊕	$1800.50	$2216.61	$0.67	($416.78)	1.3337	$5303.56
06/18/2013	Theta3Dax 30'	0	($1136.79)	($1231.87)	$95.08	$0.00	1.3374	$4166.77
06/19/2013	2 systems	0	($1099.24)	($1345.91)	$246.67	$0.00	1.3406	$3067.53
06/20/2013	3 systems	0	$4145.00	$4152.07	($7.07)	$0.00	1.3200	$7212.53
06/21/2013	OMicron3Euro	3 ⊕	$362.50	$662.50	$0.00	($300.00)	-	$7575.03
06/24/2013	AlfaID Dax 5'	0	($2355.48)	($2343.80)	($11.68)	$0.00	1.3086	$5219.55
06/25/2013	2 systems	0	$2557.24	$2546.29	$10.94	$0.00	1.3134	$7776.79
06/26/2013	IntWSCTCrude 30'	0	($1750.00)	($1755.00)	$5.00	$0.00	-	$6026.79
06/27/2013	2 FDAX systems	2 ⊕	($1026.27)	($2988.54)	($22.40)	$1984.67	1.3032	$5000.52
06/28/2013	2 systems	1 ⊕	$864.65	$773.31	$82.21	$9.13	1.3080	$5865.17
		23	$5865.17	$6427.90	$685.91	(1248.66)		

a. 'My P/L' will list the USD converted daily profit/loss, while a total in each currency will be listed at the bottom of the table for any trading done in Euros via Eurex.

b. Disclosure: The profit and loss (P/L) amounts above are provided as a convenience to you, but should not be considered apart from your official daily and monthly account statement from the clearing firm(s) which processes your trades and holds your money. Your official statements from the clearing firm includes disclosures and definitions not provided herein, and may use conversion rates which differ from those listed above. The profit and loss (P/L) shown here is derived from your activity on this platform only, and

does not sync with your balances at the clearing firm to reflect all activity in the account.

23. The 'Performance' tab also allows clients and reviewers at the IB/FCM/NFA to view how a client has performed ('My P/L') in relation to the system ('Hypo P/L') for cases when the client had the system active for the entire day ('Trading Diff') and for cases when the client started or stopped the system during the day ('Start/Stop Diff'), also listing the number of 'Start/Stops' per day.

		Select a product	Select a system		Previous Month 06/01/2013 - 06/30/2013		

Sessions

Date	System(s)	My start/stops	My P/L	Hypo P/L	Trading Diff	Start/Stop Diff	Conv. Rate	My Total P/L
06/03/2013	Theta3Dax 30'	3	($536.58)	($1520.82)	$0.00	$984.24	1.3008	($536.58)
06/04/2013	2 FDAX systems	1	($2552.94)	($138.94)	$4.09	($2418.09)	1.3092	($3089.52)

   a. The client acknowledges in the User Agreement that their actions may cause substantial differences between the system and their account:

   "Users may start and stop ATS as frequently or infrequently as they desire, and user hereby acknowledges that the performance in their account may differ substantially from the listed performance of ATS they activate/deactivate, depending on the timing of such activations/deactivations and whether that timing resulted in certain profitable/unprofitable being realized or not realized for user's account.

24. Clicking on any of the start/stop numbers listed for each day will pull up a log of what actions the user took in deviating from the system (i.e. close open position, stop system, reactivate)

stem(s)	My start/stops	My P/L	Hypo P/L	Trading Diff	Start/Stop Diff	Conv. Rate	My Tota
) systems	2	$1787.50	$1826.38	$0.00	($38.87)	-	$1787
ron3Euro	4	$362.50	($32.13)	$0.00	$394.63	-	$2150

OMicron3Euro (06/07/2013)

System	Date	Action	Action Type	Username	Action Result
LambdaBund 120'	6/7/2013 12:16:37 PM	Deactivation	INM	MRUIZJUAN	Strategy Unit 26597 has been stopped. 1 FGBL will be SOLD to close the open position.
OMicron4Euro	6/7/2013 12:12:31 AM	Reactivation	INM	MRUIZJUAN	Strategy Unit Re-activated: 26600.
OMicron3Euro	6/7/2013 11:44:22 AM	Deactivation	INM	MRUIZJUAN	Strategy Unit 26820 has been stopped. 1 URO will be BOUGHT to close the open position.
OMicron3Euro	6/7/2013 12:12:11 AM	Reactivation	INM	MRUIZJUAN	Strategy Unit Re-activated: 26820.
OMicron3Euro	6/7/2013 4:57:04 PM	Reactivation	INM	MRUIZJUAN	Strategy Unit Re-activated: 26820.
OMicron3Euro	6/7/2013 5:01:53 PM	Deactivation	INM	MRUIZJUAN	Strategy Unit 26820 has been stopped.

Attain / Trading Motion Relationship/registrations

25. TradingMotion SL is the creator and owner of the TradingMotion software. It is a Spanish company wholly owned by Jon Berrojalbiz.

26. TradingMotion, LLC is a US company wholly owned by Jon Berrojalbiz, which licenses the English language version of the TradingMotion software from TradingMotion, SL.

27. Jon Berrojalbiz is a part owner of Attain Capital Management, an NFA member, and registered principal of Attain Capital Management.

28. Attain Capital Management is a registered IB

29. TradingMotion is a dba of Attain Capital Management

30. Neither TradingMotion SL, TradingMotion, LLC, nor Attain is advising on the value or advisability of buying or selling futures. They are collectively providing a front end piece of software enabling the client to buy and sell futures via algorithms the client chooses.

31. Neither TradingMotion SL, TradingMotion, LLC, nor Attain is exercising trading authority over a customer's account, and none are giving advice based upon knowledge of or tailored to customer's particular commodity interest account, trading activity, or similar types of information.

32. Neither TradingMotion SL, TradingMotion, LLC, nor Attain is holding itself out as a CTA

33. Attain Capital pays TradingMotion, LLC a license fee equal to 50% of its monthly net revenues attributable to the TradingMotion platform fees

34. Attain Capital pays TradingMotion, LLC a license fee equal to 90% of its monthly net revenues attributable to the TradingMotion license fees