

Client Complaints and Arbitration Notice

Model Program Advisors, LLC (proposed) · a multi-program commodity trading advisor · mpacient.com
Template for counsel review · October 28, 2026 · Principal: Austin Putt · BRACKETED TEMPLATE — nothing herein is used unless and until the Advisor is registered with the CFTC as a CTA and is a Member of NFA with an NFA-accepted Disclosure Document

1. How to raise a complaint

Write to the Advisor's compliance contact at [EMAIL] or [ADDRESS], or use the Complaint link in the doorway. Say what happened, when, which program and account are involved, and what outcome you want. Complaints about your brand membership, education, Tech Pass, or rewards program go to your brand, not the Advisor; complaints about the trading program, its fees, its disclosures, or its execution come to the Advisor.

2. What the Advisor does with it

The Advisor acknowledges every complaint in writing within [five] business days, records it in its complaint log with the date received, the client, the subject, and the handling, investigates it under the supervision of its principal, and responds in writing within [thirty] days with its findings and any action taken. Complaints that allege a violation of CFTC regulations or NFA rules are escalated to the principal immediately and are retained for the period Regulation 1.31 requires. The complaint log is available to NFA on request.

3. Your right to arbitration

As a Member of NFA, the Advisor is required to arbitrate disputes with clients that arise out of its futures business before NFA, at the client's election, under NFA's Member Arbitration Rules. You do not have to use the Advisor's internal process first, and you do not give up any right by using it. The Advisor may require you to arbitrate only as permitted by NFA rules and only under a written pre-dispute arbitration agreement that meets Regulation 166.5.

4. Pre-dispute arbitration agreement (Client Agreement §9)

[Counsel: insert the Reg. 166.5-compliant pre-dispute arbitration clause, including the required cautionary language, the client's right to select the forum including NFA arbitration, the 45-day forum election procedure, and the statement that the agreement is not a condition of doing business with the Advisor.]

5. Regulators

You may also contact the CFTC (Division of Enforcement, www.cftc.gov, 866-366-2382) or NFA (www.nfa.futures.org, 800-621-3570), which maintains a public registration record for the Advisor (BASIC) at nfa.futures.org/basicnet.

6. Where this notice appears

In the doorway at enrollment; in the Documents section of mpacient.com; in every fee invoice footer; and in the Client Agreement.

Template prepared for counsel and the Advisor's principal. Not legal advice. Counsel must complete, conform to current CFTC regulations and NFA rules, and approve before any use.