

**LIME TRADING CORP**

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**COMMODITY FUTURES TRADING COMMISSION RULE 1.55(k): FIRM-  
SPECIFIC DISCLOSURE DOCUMENT  
March 1, 2024.**

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**LIME TRADING CORP.  
COMMODITY FUTURES TRADING COMMISSION  
RULE 1.55(k):  
FIRM-SPECIFIC DISCLOSURE DOCUMENT**

The Commodity Futures Trading Commission (“Commission” or “CFTC”) requires each futures commission merchant (“FCM”), including LIME TRADING CORP (“LIME” or the “Company”), to provide the following information to a customer prior to the time the customer first enters into an account agreement with the FCM or deposits money or securities (funds) with the FCM. Except as otherwise noted below, the information set out is as of November 28, 2023. LIME will update this information annually and as necessary to take account of any material change to its business operations, financial condition or other factors that LIME believes may be material to a customer’s decision to do business with LIME. The company was formerly known as SCORE PRIORITY CORP. SCORE legally changed its name to LIME TRADING CORP on February 25<sup>th</sup>, 2022. Nonetheless, LIME’s business activities and financial data are not static and will change in non-material ways frequently throughout any 12- month period.

**Firm and its Principals**

LIME TRADING CORP  
One Penn Plaza, Suite 1614  
New York, NY 10119  
646-630-1001 (telephone)  
[futures@lime.co](mailto:futures@lime.co)

LIME’s Designated Self-Regulatory Organization (“DSRO”) is the National Futures Association, [www.nfa.futures.org](http://www.nfa.futures.org)

*The name, title, business address, business background, areas of responsibility and the nature of the duties of each principal as defined in CFTC Rule 3.1(a).*

***Johan Sandblom – CEO***

With over 20 years of Wall Street experience, Johan Sandblom is the Chief Executive Officer of Lime Trading Corp. Prior to joining Lime Trading, Johan was with Lime Brokerage and also served as Head of U.S. Execution for Neonet Securities Inc. Johan received his BA degree in Marketing, an MBA in Finance, and an MSIS degree from Hawaii Pacific University in Honolulu. Johan holds Series 3, 4, 7, 24, 55, 63 licenses.

***Dennis Young – FinOp***

Financial professional with over 40 years’ experience in public accounting and securities brokerage. Skilled manager with substantial knowledge of accounting and information systems, compliance and back-office operations, and experience in self-clearing and fully disclosed broker-dealer environments, equity and municipal underwriting, trading, and regulatory and tax reporting. Graduate of the University of Washington Foster School of Business, 1976. Certified Public Accountant, 1978. Member, American Institute of Certified Public Accountants. Prior experience includes: audit supervisor for a public accounting firm, and financial and compliance principal at several firms specializing in underwriting, market making and trading in municipal bonds and notes, VRDNs, equities and, CMOs, in both retail and institutional environments. Also managed the Section 20 broker-dealer subsidiary of Security Pacific Bank and then Bank of America during and after their merger. Dennis holds series 7, 24, 27 and 63 licenses.

***Manny Alicandro – CCO***

He has over 32 years of experience in the financial services industry, as an attorney and Chief Compliance Officer. Previously in his career, he was General Counsel at MANA Partners, Director of the Financial Services Risk and Regulatory Practice at PwC, Executive Director and Assistant General Counsel at JPMorgan Chase and Vice President at NASDAQ. He has a BA from New York University, an MS from Pace University, a JD from New York Law School and an MBA from MIT. He is a member of the Bar, State of New York and is admitted in the Southern District of New York, the Eastern District of New York, the DC Federal Court, the United States Court of Appeals, Second Circuit, the US Tax Court and the US Supreme Court.

***Evgeny Kuteev – Head of Futures***

Evgeny Kuteev has over 25 years of derivative brokerage development and operations experience. He played key roles establishing multiple international brokerages. Evgeny earned a Master of Science degree in Applied Mathematics from Moscow Aviation University. Evgeny holds a series 3 license.

**The business address for all of LIME’s principals listed above is 1 Penn Plaza, Suite 1614, New York, NY 10119.**

**Other Principals of the Company**

Individuals and entities, set forth below, are listed as principals of LIME TRADING CORP in accordance with CFTC Rule 3.1, solely because they directly or indirectly control an ownership interest of ten percent or more in the Company or because they have directly or indirectly contributed ten percent or more of the capital of the Company. These individuals and entities are not deemed material for the purposes of this disclosure document because they do not participate in the management of the Company.

**FH Global Inc** – 100% owner of LIME TRADING CORP  
**Victor Remsha** – 100% owner of FH Global Inc.

**Firm’s Business Activities and Product Lines**

In addition to LIME’s FCM business (details below). LIME is an SEC registered Broker-Dealer and member of FINRA. In its capacity as broker-dealer, LIME offers brokerage services to retail investors, including buying and selling securities at the customers discretion and provides investment research services upon request. LIME does not self-clear and does not hold securities or customers funds. Customers are carried by several securities clearing firms. The designated self-regulatory organization (DSRO) for the firm’s securities business is FINRA. Visit [www.finra.org](http://www.finra.org) for further information about LIME’s broker dealer registration on “broker check”

LIME is a non-clearing CFTC registered, Futures Commission Merchant (FCM) and is a member of the National Futures Association (NFA) it’s designated self-regulatory authority (DSRO) for its futures business. LIME is not a member of any futures exchanges or futures clearing houses.

### **FCM Customer Business**

LIME's customers are primarily self-directed retail customers. The source of obtaining customers is through its website [www.lime.co](http://www.lime.co). Customers have access to trade most futures markets, domestic and international. The firm does not engage in any proprietary trading. The firm does not manage any customer accounts.

Set forth below is a table showing LIME's primary business activities and the approximate percentage of its assets and capital that are used in each type of activity as of November 28, 2022. LIME's primary line of business is a securities broker-dealer.

<b>Activity/Product Line</b>	<b>Percentage of Allowable Assets</b>	<b>Percentage of Capital, Based Upon Charges to Net Capital</b>
Securities Brokerage	35%	35%
Institutional Execution	55%	55%
Futures Brokerage	10%	10%

LIME's customers include individuals, IRA and other retirement accounts, partnerships, corporations, LLC and trust accounts, and commercial hedgers. LIME does not carry any futures accounts on behalf of high frequency traders.

Trading is concentrated in financial futures and options contracts that are cleared on the Chicago Mercantile Exchange (CME). A small portion of LIME's customers also trade agricultural and grain futures.

LIME customers also trade contracts on the following exchanges:

- (i) Commodity Exchange Inc. (COMEX)
- (ii) New York Mercantile Exchange, Inc. (NYMEX)
- (iii) ICE Futures US, Inc.

CME Clearing, a division of Chicago Mercantile Exchange Inc., is the clearinghouse for all trades executed on CME, CBOT, COMEX and NYMEX. The clearinghouse for trades executed on ICE is ICE Clear US Inc.

LIME is not a member of any futures exchanges. LIME has entered into a clearing agreement with Straits Financial LLC, based in Chicago IL, which is a clearing member of all major commodity exchanges in the United States. Lime will clear its futures business on a non-disclosed omnibus basis through Straits Financial LLC.

### **Permitted Depositories and Counterparties**

LIME will not allow any entity affiliated with LIME to be a depository for segregated funds. LIME will only maintain customer segregated funds with Futures Commission Merchants (FCMs),

banks, and in money market mutual funds.

**Futures Commission Merchants:**

In order to be satisfied that FCMs with which LIME conducts business meet sufficient capitalization, creditworthiness, operational reliability and access to liquidity, LIME will only deposit customer funds with clearing members of CME Group that are eligible to clear CME products for customers.

**FCM Concentration Risk**

As business expands, LIME will make a best effort to maintain at least two clearing arrangements with CME Group clearing entities in order to disburse concentration and have a clear path to transfer customer positions and equity from one FCM to another should the need arise.

**Banks:**

In order to be satisfied that the bank with which LIME conducts business has sufficient capitalization, creditworthiness, operational reliability and access to liquidity, LIME will only deposit customer funds with large well capitalized banks whose holding company stock is publicly traded. LIME will not deposit funds in any bank that is not among the 100 largest publicly traded US banks, ranked by assets. LIME will monitor publicly available financial information on each bank, including but not limited to stock price performance and third-party credit ratings, for material changes.

All cash deposits with banks must be immediately available on demand.

As business expands, LIME will make a best effort to maintain accounts with at least two banks to disburse concentration and have a clear path to transfer funds from one bank to another should the need arise.

**Money Market Mutual Funds:**

In order to be satisfied that money market mutual funds in which LIME may invest customer funds meet sufficient capitalization, creditworthiness, operational reliability and access to liquidity, LIME will only deposit customer funds in money market mutual funds with at least \$1 billion in assets, which are managed by investment advisers with assets under supervision of at least \$25 billion. LIME will monitor the prospectus or other publicly available information on each money market mutual fund for material changes.

**Permitted Investments.** LIME will limit its investment of customer funds to United States Treasury securities and money market mutual funds, in accordance with CFTC Rule 1.25(a)(1).

#### Other Restrictions.

- a. LIME will not enter into repurchase agreements or reverse repurchase agreements in connection with its investments in US Treasury securities.
- b. The dollar-weighted average of the time-to-maturity of the portfolio may not exceed 24 months.
- c. With the exception of money market mutual funds, no permitted investment may contain an embedded derivative of any kind.
- d. No instrument may contain interest-only payment features.
- e. No instrument may provide payments linked to a commodity, currency, reference instrument, index, or benchmark, and it may not otherwise constitute a derivative instrument.
- f. Adjustable rate securities are not permitted.
- g. LIME shall not invest customer funds in obligations of an entity affiliated with LIME.

#### **Material Risks**

LIME has determined that it will limit the market, credit, counterparty, operational, and liquidity risks associated with its investments of customer funds by adopting conservative standards for the investment of customer funds. In order to assure that it is in compliance with its regulatory capital requirements and that it has sufficient liquidity to meet its ongoing business obligations, with the exception of deposits with clearing FCMs, LIME holds substantially all of its liquid assets in cash, U.S. Treasury securities and money market mutual funds.

The Company has concentrated its credit risk for cash by maintaining deposits in financial institutions which may at times exceed amounts covered by insurance provided by the U.S. Federal Deposit Insurance Corporation (“FDIC”). The Company has not experienced any losses in such accounts and management believes the Company is not exposed to significant risk to cash.

Depending upon prevailing interest rates, a portion of customer funds may be invested in U.S. Treasury securities. U.S. Treasury securities are backed by the full faith and credit of the U.S. government and are therefore deemed to have negligible credit risk. U.S. Treasury securities are highly liquid. Like all bonds, U.S. Treasury securities are subject to market risk. Changes in interest rates affect the value of such securities. By regulation, LIME must limit market risk by maintaining a dollar-weighted average time-to-maturity of the securities portfolio not to exceed 24 months. At October 31, 2023, LIME did not hold any U.S. Treasury securities.

Depending upon prevailing interest rates, the Company may invest a portion of customer funds, and a portion of its own funds, in money market mutual funds that meet the investment criteria set forth in CFTC Rule 1.25. Such funds may invest in U.S. Treasuries, certificates of deposit, corporate commercial paper, and other short-term instruments. Assets in money market mutual funds do not qualify for FDIC deposit insurance. At October 31, 2023 LIME did not hold any money market mutual fund investments.

The Company may have amounts due from clearing brokers. To minimize risk, management has evaluated the credit worthiness of these entities. As a result, management believes the Company is not exposed to significant risk on receivables from these entities.

**Creditworthiness.** LIME is a privately held company and has not received a credit rating from any of the nationally recognized statistical rating organizations.

**Capital.** The purpose of the FCM's capital requirement is to assure that the FCM has sufficient capital to protect customers in the event of any inadequacy in customer funds arising from the default of one or more customers, adverse market conditions, or for any other reason. As of October 31, 2023, LIME had adjusted net capital of \$9,264,303 and excess net capital of \$8,264,303.

**Liquidity.** At October 31, 2023, LIME's assets totaled \$18,900,943 and of that \$12,539,101 are considered current per CFTC regulations. It is the Company's policy to limit investment of customer funds to U.S. Treasury securities and money market mutual funds only. U.S. Treasury securities and money market mutual funds are highly liquid. At October 31, 2023, LIME did not hold any cash or securities for its futures customers. LIME maintains sufficient liquidity to meet customer settlements and funds requests.

**Other Lines of Business.** LIME operates a futures commission merchant business and an SEC-registered securities brokerage business on an introducing broker basis. The firm does not engage in proprietary trading.

LIME does not invest customer funds in affiliated entities.

**Significant liabilities, contingent or otherwise, and material commitments.**

The Company is obligated under a noncancelable operating lease for its corporate headquarters that expires on August 31, 2026. The following is a schedule of minimum lease payments required under the noncancelable operating lease for the years ending December 31:

2024	\$ 236,151
2025	236,151
2026	<u>216,472</u>
	<u>\$ 688,774</u>

In the normal course of business, the Company's activities involve the execution of customers' futures, options and securities transactions with exchanges and brokers. These activities may expose the Company to risk in the event the customers, or clearing brokers are unable to fulfill their contracted obligations.

The Company seeks to control the risks associated with its activities by requiring customers to maintain margin collateral in compliance with various regulatory and internal guidelines and by dealing with brokers who are subject to CFTC or Securities Exchange Commission financial requirements. The Company monitors required margin levels and, pursuant to such guidelines, requires customers and noncustomers to deposit additional funds, or reduce positions, when necessary.

**Other Risks**

**Proprietary Trading.** The Company does not engage in proprietary trading for its own account and risk.

**Market Concentration.** LIME's monitors customer trading. If it finds that customers become heavily concentrated in a particular market sector, the firm will closely monitor market stress testing to detect potential sudden large trading losses. The Company seeks to control this risk in most cases by requiring account deposits from customers that are in excess of exchange margin requirements.



## Material Complaints or Actions

In April 2021, the Company entered into a Letter of Acceptance, Waiver, and Consent (AWC) with FINRA related to the Company's anti-money laundering program. Under the terms of the AWC, the Company agreed to a fine of \$250,000 and the engagement of an independent consultant to review the reasonableness of the Company's policies, systems, procedures (written or otherwise), and training related to compliance with FINRA Rule 3310 and the requirements of the Bank Secrecy Act, and the regulations promulgated thereunder.

In February 2024, Lime Trading settled a complaint with the NFA in which the firm neither admitted nor denied the allegations of the Complaint. In making the offer, Lime Trading stipulated and agreed to cease and desist from violating NFA financial requirements sections 1(e) and 16(e), and NFA compliance rule 2-9(a) and paid a fine of \$100,000 to the NFA. Lime Trading also acknowledged in the offer that any decision accepting the offer would include findings that Lime Trading violated requirements NFA financial requirements sections 1(e) and 16(e), and NFA compliance rule 2-9(a).

Additional details on the AWC may be read on FINRA's Broker

Check at <https://brokercheck.finra.org/>

## Customer Funds Segregation

**Customer Accounts.** FCMs may maintain up to three different types of accounts for customers, depending on the products a customer trades:

- (i) a **Customer Segregated Account** for customers that trade futures and options on futures listed on US futures exchanges;
- (ii) a **30.7 Account** for customers that trade futures and options on futures listed on foreign boards of trade; and
- (iii) a **Cleared Swaps Customer Account** for customers trading swaps that are cleared on a derivatives clearing organization (DCO) registered with the Commission. As of the date of this document, LIME has not traded any cleared swap contracts, nor does it anticipate trading cleared swaps.

The requirement to maintain these separate accounts reflects the different risks posed by the different products. Cash, securities and other collateral (collectively, **Customer Funds**) required to be held in one type of account, *e.g.*, the Customer Segregated Account, may not be commingled with funds required to be held in another type of account, *e.g.*, the 30.7 Account, except as the Commission may permit by order.

**Customer Segregated Account.** Funds that customers deposit with an FCM, or that are otherwise required to be held for the benefit of customers, to margin futures and options on futures contracts traded on futures exchanges located in the US, *i.e.*, designated contract markets, are held in a Customer Segregated Account in accordance with section 4d(a)(2) of the Commodity Exchange Act and Commission Rule 1.20. Customer Segregated Funds held in the Customer Segregated Account may not be used to meet the obligations of the FCM or any other person, including another customer.

All Customer Segregated Funds may be commingled in a single account, *i.e.*, a customer omnibus account, and held with: (i) a bank or trust company located in the US; (ii) a bank or trust company located outside of the US that has in excess of \$1 billion of regulatory capital; (iii) an FCM; or (iv) a DCO. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's customers. Unless a customer provides instructions to the

contrary, an FCM may hold Customer Segregated Funds only: (i) in the US; (ii) in a money center country;<sup>1</sup> or (iii) in the country of origin of the currency.

**30.7 Account.** Funds that 30.7 Customers deposit with an FCM, or that are otherwise required to be held for the benefit of customers, to margin futures and options on futures contracts traded on foreign boards of trade, *i.e.*, 30.7 Customer Funds, and sometimes referred to as the foreign futures and foreign options secured amount, are held in a 30.7 Account in accordance with Commission Rule 30.7.

Funds required to be held in the 30.7 Account for or on behalf of 30.7 Customers may be commingled in an omnibus account and held with: (i) a bank or trust company located in the US; (ii) a bank or trust company located outside the US that has in excess of \$1 billion in regulatory capital; (iii) an FCM; (iv) a DCO; (v) the clearing organization of any foreign board of trade; (vi) a foreign broker; or (vii) such clearing organization's or foreign broker's designated depositories. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's

30.7 Customers. As explained below, Commission Rule 30.7 restricts the amount of such funds that may be held outside of the US.

Customers trading on foreign markets assume additional risks. Laws or regulations will vary depending on the foreign jurisdiction in which the transaction occurs, and funds held in a 30.7 account outside of the US may not receive the same level of protection as Customer Segregated Funds. If the foreign broker carrying 30.7 Customer positions fails, the broker will be liquidated in accordance with the laws of the jurisdiction in which it is organized, which laws may differ significantly from the US Bankruptcy Code. Return of 30.7 Customer Funds to the US will be delayed and likely will be subject to the costs of administration of the failed foreign broker in accordance with the law of the applicable jurisdiction, as well as possible other intervening foreign brokers, if multiple foreign brokers were used to process the US customers' transactions on foreign markets.

If the foreign broker does not fail but the 30.7 Customers' US FCM fails, the foreign broker may want to assure that appropriate authorization has been obtained before returning the 30.7 Customer Funds to the FCM's trustee, which may delay their return. If both the foreign broker and the US FCM were to fail, potential differences between the trustee for the US FCM and the administrator for the foreign broker, each with independent fiduciary obligations under applicable law, may result in significant delays and additional administrative expenses. Use of other intervening foreign brokers by the US FCM to process the trades of 30.7 Customers on foreign markets may cause additional delays and administrative expenses.

To reduce the potential risk to 30.7 Customer Funds held outside of the US, Commission Rule 30.7 generally provides that an FCM may not deposit or hold 30.7 Customer Funds in permitted accounts outside of the US except as necessary to meet margin requirements, including prefunding margin requirements, established by rule, regulation, or order of the relevant foreign boards of trade or foreign clearing organizations, or to meet margin calls issued by foreign brokers carrying the 30.7 Customers' positions. The rule further provides, however, that, in order to avoid the daily transfer of funds from accounts in the US, an FCM may maintain in accounts located outside of the US an additional amount of up to 20 percent of the total amount of funds necessary to meet margin and prefunding margin requirements to avoid daily transfers of funds.

**Cleared Swaps Customer Account.** Funds deposited with an FCM, or otherwise required to be held for the benefit of customers, to margin swaps cleared through a registered DCO, *i.e.*, Cleared Swaps Customer Collateral, are held in a Cleared Swaps Customer Account in accordance with the provisions of section 4d(f) of the Act and Part 22 of the Commission's rules. Cleared Swaps Customer Accounts are sometimes referred to as LSOC Accounts. LSOC is an acronym for "legally separated, operationally commingled." Funds required to be held in a Cleared Swaps Customer Account may be commingled

in an omnibus account and held with: (i) a bank or trust company located in the US; (ii) a bank or trust company located outside of the US that has in excess of \$1 billion of regulatory capital; (iii) a DCO; or (iv) another FCM. Such commingled account must be properly titled to make clear that the funds belong to, and are being held for the benefit of, the FCM's Cleared Swaps Customers.

**Investment of Customer Funds.** Section 4d(a)(2) of the Act authorizes FCMs to invest Customer Segregated Funds in obligations of the United States, in general obligations of any State or of any political subdivision thereof, and in obligations fully guaranteed as to principal and interest by the United States. Section 4d(f) authorizes FCMs to invest Cleared Swaps Customer Collateral in similar instruments.

Commission Rule 1.25 authorizes FCMs to invest Customer Segregated Funds, Cleared Swaps Customer Collateral and 30.7 Customer Funds in instruments of a similar nature. Commission rules further provide that the FCM may retain all gains earned and is responsible for investment losses incurred in connection with the investment of Customer Funds.

Permitted investments include:

- (i) Obligations of the United States and obligations fully guaranteed as to principal and interest by the United States (U.S. government securities);
- (ii) General obligations of any State or of any political subdivision thereof (municipal securities);
- (iii) Obligations of any United States government corporation or enterprise sponsored by the United States government (U.S. agency obligations);<sup>2</sup>
- (iv) Certificates of deposit issued by a bank (certificates of deposit) as defined in section 3(a)(6) of the Securities Exchange Act of 1934, or a domestic branch of a foreign bank that carries deposits insured by the Federal Deposit Insurance Corporation;
- (v) Commercial paper fully guaranteed as to principal and interest by the United States under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (commercial paper);
- (vi) Corporate notes or bonds fully guaranteed as to principal and interest by the United States under the Temporary Liquidity Guarantee Program as administered by the Federal Deposit Insurance Corporation (corporate notes or bonds); and
- (vii) Interests in money market mutual funds.

The duration of the securities in which an FCM invests Customer Funds cannot exceed, on average, two years.

An FCM may also engage in repurchase and reverse repurchase transactions with non-affiliated registered broker-dealers, provided such transactions are made on a delivery versus payment basis and involve only permitted investments. All funds or securities received in repurchase and reverse repurchase transactions with Customer Funds must be held in the appropriate Customer Account, *i.e.*, Customer Segregated Account, 30.7 Account or Cleared Swaps Customer Account. Further, in accordance with the provisions of Commission Rule 1.25, all such funds or collateral must be received in the appropriate Customer Account on a delivery versus payment basis in immediately available funds.<sup>3</sup>

Further, Commission rules require LIME to hold funds deposited to margin futures and options on futures contracts traded on US designated contract markets in Customer Segregated Accounts. Similarly, LIME must hold funds deposited to margin cleared swaps and futures and options on futures contracts traded on foreign boards of trade in a Cleared Swaps Customer Account or a 30.7 Account, respectively. In computing its Customer Funds requirements under relevant Commission rules, LIME may only consider those Customer Funds actually held in the applicable Customer Accounts and may not apply free funds in an account under identical ownership but of a different classification or account type (e.g., securities, Customer Segregated, 30.7) to an account's margin deficiency. In order to be used for margin purposes, the funds must actually transfer to the identically owned under-margined account.

**No SIPC Protection.** It is important to understand that the funds you deposit with an FCM for trading futures and options on futures contracts on either US or foreign markets or cleared swaps are not protected by the Securities Investor Protection Corporation (SIPC), even if the FCM is also registered with the Securities Exchange Commission as a broker-dealer. LIME is registered as a broker-dealer and is a member of SIPC.

### Filing a Complaint

A customer that wishes to file a complaint about LIME or one of its employees with the Commission can contact the Division of Enforcement electronically at <https://forms.cftc.gov/fp/complaintform.aspx> or by calling the Division of Enforcement toll-free at 866-FON-CFTC (866-366-2382).

A customer may file a complaint about LIME or one of its employees with the National Futures Association electronically at <http://www.nfa.futures.org/basicnet/Complaint.aspx> or by calling NFA directly at 800-621-3570.

### Relevant Financial Data

LIME's most recent annual audited financial statements can be found on its website, [www.lime.co](http://www.lime.co)

### Financial data as of the most recent month-end when the Disclosure Document is prepared.

The following unaudited data is as of October 31, 2023.

*FCM's total equity, regulatory capital, and net worth, all computed in accordance with U.S. Generally Accepted Accounting Principles and Rule 1.17, as applicable;*

Total Ownership Equity	\$15,794,145
Tentative Net Capital	\$ 9,432,303
Adjusted Net Capital	\$ 9,264,303
Excess Net Capital	\$ 8,264,303

*Dollar value of the FCM's proprietary margin requirements as a percentage of the aggregate margin requirement for futures customers, cleared swaps customers, and 30.7 customers;*

Proprietary Margin Requirement = None. The firm does not conduct proprietary trading.

*The number of futures customers, cleared swaps customers, and 30.7 customers that comprise 50 percent of the FCM's total funds held for futures customers, cleared swaps customers, and 30.7 customers, respectively;*

None. We had no cleared swap or 30.7 customer deposits.

*The aggregate notional value, by asset class, of all non-hedged, principal over-the counter transactions into which the FCM has entered;*

None.

*The amount, generic source and purpose of any unsecured lines of credit (or similar short-term funding) the FCM has obtained but not yet drawn upon:*

None.

*The aggregated amount of financing the FCM provides for customer transactions involving illiquid financial products for which it is difficult to obtain timely and accurate prices;*

None.

*The percentage of futures customer, cleared swaps customer, and 30.7 customer receivable balances that the FCM had to write-off as uncollectable during the past 12-month period, as compared to the current balance of funds held for futures customers, cleared swaps customers, and 30.7 customers.*

None.

Additional financial information on all FCMs is also available on the Commission's website at: <http://www.cftc.gov/MarketReports/financialfcmdata/index.htm>.

Customers should be aware that the National Futures Association (NFA) publishes on its website certain financial information with respect to each FCM. The FCM Capital Report provides each FCM's most recent month-end adjusted net capital, required net capital, and excess net capital. (Information for a twelve-month period is available.) In addition, NFA publishes twice-monthly a Customer Segregated Funds report, which shows for each FCM: (i) total funds held in Customer Segregated Accounts; (ii) total funds required to be held in Customer Segregated Accounts; and (iii) excess segregated funds, *i.e.*, the FCM's Residual Interest. This report also shows the percentage of Customer Segregated Funds that are held in cash and each of the permitted investments under Commission Rule 1.25. Finally, the report indicates whether the FCM held any Customer Segregated Funds during that month at a depository that is an affiliate of the FCM.

The report shows the most recent semi-monthly information, but the public will also have the ability to see information for the most recent twelve-month period. A 30.7 Customer Funds report and a Customer Cleared Swaps Collateral report provides the same information with respect to the 30.7 Account and the Cleared Swaps Customer Account.

The above financial information reports can be found by conducting a search for a specific FCM in NFA's BASIC system (<http://www.nfa.futures.org/basicnet/>) and then clicking on "View Financial Information" on the FCM's BASIC Details page.

## **Current Risk Practices, Controls and Procedures**

LIME has adopted a system of risk management policies and procedures designed to monitor and manage the risks associated with its activities as a futures commission merchant. In accordance with the requirements of CFTC Rule 1.11, LIME's "Risk Management Program" establishes a separate risk management unit that monitors and manages risks inherent in the business of a futures commission merchant, such as market, credit, liquidity, foreign currency, legal, operational, settlement, segregation, technological and capital risks.

LIME's business practices are designed to manage and control the risks of its business and protect the safety of customer funds. The Company maintains capital well in excess of minimum regulatory requirements, and substantially all of its capital is liquid. Customers must have sufficient funds available in their accounts before placing orders on its platform.

The risk management unit is required to provide quarterly "Risk Exposure Reports" to senior management of the Company, including LIME's Chairman. Copies of such reports must be filed with the CFTC. The Risk Management Program must be reviewed and tested annually by qualified internal audit staff or a qualified third-party audit service.

This Disclosure Document was first used on November 28, 2023