Promotional Material Review Procedures — Model Program Advisors, LLC (NFA Rule 2-29)

Model Program Advisors, LLC (proposed) · a multi-program commodity trading advisor · mpaclient.com
Privileged & Confidential — Prepared for Counsel and the Advisor's principal, Austin Donald Putt Effective Date: [DATE] (PHASE TWO — nothing filed or pending — BRACKETED TEMPLATE — adopted by Model Program Advisors, LLC upon counsel approval; governs all promotional material relating to the futures program)

1. Purpose and Scope

These procedures implement NFA Compliance Rule 2-29 for Model Program Advisors, LLC (the "Advisor"). "Promotional material" is read broadly: any text, image, audio, video, webpage, social post, presentation, webinar, email, or script addressed to the public that pertains to the Advisor's futures trading program — including any portion of the AI Trade Pros platform, site, or member portal that describes the futures program, and any third-party content the Advisor causes to be distributed. Material that never references the futures program (education, spot-rail features, the software subscription) is outside the Advisor's Rule 2-29 file but remains subject to the platform's own standards.

2. Standing Prohibitions

No promotional material may: state or imply that futures trading is appropriate for everyone or low-risk; guarantee profit or protection against loss; present any past result as indicative of future results; present a simulated, backtested, or extracted result without the Reg. 4.41(b) disclaimer verbatim and with equal prominence; cherry-pick results or time windows; reference the accumulated size of any payout, balance, or fund; use the banned platform vocabulary (see the Vocabulary Discipline register — no "signals," no "autotrading," no "guaranteed," no "passive income"); or state a leverage figure without a dated substantiation record and the "set by your venue, varies" qualifier.

3. The Marketer Wall

Independent marketers are compensated for software referrals only and are prohibited from creating, adapting, or distributing any content that references the futures program, in any language, on any channel. The only futures-related content a marketer may share is platform-provided creative bearing a review-log ID under Section 4. Violation is grounds for termination under the Independent Marketers Disclosure. [Counsel: confirm this wall keeps marketers outside AP status and the Advisor's 2-29 exposure.]

4. Pre-Use Review Workflow

Every item of promotional material is reviewed and approved in writing by [REVIEWING PRINCIPAL/AP NAME or "the designated review officer"] before first use. The review log records: item ID; description and channel; creator; date submitted; reviewer; date approved, revised, or rejected; the substantiation relied on (with file references); required legends confirmed present; and first-use and last-use dates. Material is re-reviewed on any substantive change and retired when any underlying fact (fees, leverage, venue features) changes. [If the Advisor registers and NFA requires filing of certain audio-visual material before use, counsel to add that step.]

5. Substantiation File

Every factual and statistical claim in promotional material must be supported by a contemporaneous record in the substantiation file before approval: dated venue fee schedules and screenshots, the Advisor's measured execution data (e.g., the dated "Kalshi Setup" measurements), leverage figures with capture dates, and the published results-methodology page for any performance display. Claims without a file entry are not approved.

6. Recordkeeping

All promotional material, review-log entries, and supporting substantiation are retained for five years from last use, the first two years readily accessible, consistent with NFA rules and Reg. 4.33. [Counsel: confirm retention specifics and where the file lives — recommend the same document-control system as the compliance library.]

7. Training and Annual Review

Every person who creates or approves promotional material receives these procedures on engagement and annually. The procedures themselves are reviewed annually by [PRINCIPAL] and counsel, and upon any NFA rule change affecting Rule 2-29 or Part 4.

This document is a bracketed template prepared internally to accelerate counsel's drafting of the Advisor's supervisory procedures. It must be completed, conformed to current NFA rules, and approved by counsel before adoption.