

# GTF Compliance Enforcement for CODs

v1.1

10/19/2020

To better encourage compliance for Advertising and Sales Policy at GTF the following incentives and penalties will be enforced, effective 9/15/2020:

## Violation Types:

1. Major compliance violations
  - a. Any written, verbal or recorded income or lifestyle claim without proof and disclosure properly displayed with the claim.
  - b. Examples:
    - i. "I'm averaging \$200 a day day-trading"
    - ii. "I have a 90% win rate"
    - iii. "I just bought a new home with my money from day trading"
2. Minor compliance violations
  - a. Any written, verbal or recorded income or lifestyle claim with proof (i.e., screenshot/image or printout of trading account, tax return, etc.), but with **no** [Trading Performance Disclosure](#) properly displayed with the claim.
  - b. Website, landing page, business email, newsletter or live webinar with **no** [Full Risk Disclosure](#) properly displayed or read.
  - c. Usage of words such as "proven," "guaranteed," "full time income", "system", etc.
  - d. Example:

Trade	Time	Profit/Loss
EURUSD, buy 1.00	2019.04.11 15:36:29	113.00
USDJPY, sell 2.00	2019.04.11 16:05:13	-157.98
USDJPY, buy 2.00	2019.04.11 16:05:20	113.12
<b>Profit:</b>		<b>32.26</b>
<b>Credit:</b>		<b>0.00</b>
<b>Deposit:</b>		<b>0.00</b>
<b>Withdrawal:</b>		<b>0.00</b>

[Trading Performance Disclosure missing]

**Penalties:**

1. Major violation - \$200 per day, after a 10-day warning. A verbal claim is \$200 per violation, with one prior warning.
2. Minor violation - \$100 per day, after a 10-day warning. A verbal claim is \$100 per violation, with one prior warning.
3. Penalties will be assessed on commission payments.
4. If the violation continues GTF may terminate your COD license, according to the terms of your agreement.

**Incentives:**

1. Formal Audit Completion (within 4 weeks of Audit Report delivered to COD) - \$100 gift card.
2. Clean Audit Record (No Violations for a Calendar Year). This bonus will be based on the COD's annual sales revenue as follows:

COD's Annual Sales Revenue	Cash Bonus
\$1,000,000+	\$1,500
\$500,000+	\$1,000
\$100,000+	\$500
\$50,000+	\$100