

Website Terms of Use — mpaclient.com

Model Program Advisors, LLC (proposed) · a multi-program commodity trading advisor · mpaclient.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. The site and who runs it

mpaclient.com (the "Site") is operated by Model Program Advisors, LLC (the "Advisor"). These Terms govern your use of the public pages of the Site. The client doorway — the pages reached only by single sign-on from a connected brand — is governed additionally by the Advisor's Disclosure Document, Client Agreement, and the consents you give there; if these Terms and those documents conflict, those documents control for the doorway.

2. Not an offer, not a solicitation, not advice

The public pages describe the Advisor's business. They are not an offer to provide advisory services, a solicitation of any client, a recommendation of any program, model, provider, venue, leverage level, or account size, or investment, legal, or tax advice. The Advisor's programs are offered only through its Disclosure Document, delivered to eligible clients of connected brands through the doorway, and only in jurisdictions where the Advisor may lawfully offer them.

3. Performance information

No performance figure appears on the public Site. Performance, actual or hypothetical, is presented only in the Advisor's Disclosure Document and in the doorway, in the form and with the legends that CFTC Regulation 4.35 and NFA Rule 2-29 require, after the Advisor's compliance review. Any performance figure you see elsewhere attributed to the Advisor or its programs is unauthorized unless it carries those legends and the Advisor's approval mark.

4. Connected brands and their marketers

The Advisor is an independent company. The brands whose members reach the doorway are its clients under written program agreements; they are not its agents, and their marketers are not the Advisor's associated persons. No brand or marketer is compensated by the Advisor for any client's enrollment, funding, trading, or results, and none is authorized to recommend any program or to answer questions about it. If a marketer has done either, tell the Advisor at [EMAIL].

5. Risk

Futures, perpetual futures, and leveraged trading involve substantial risk of loss and are not suitable for everyone. You can lose more than the margin you post. Read the Advisor's Risk Disclosure before considering any program.

6. Accounts and funds

The Advisor never holds, pools, receives, or transmits client funds. Clients hold their own accounts at regulated venues. Any request on this Site or elsewhere to send funds to the Advisor or to anyone on its behalf is fraudulent; report it to [EMAIL].

7. Intellectual property and acceptable use

The Site's content is the Advisor's or its licensors'. You may view it for personal, non-commercial purposes. You may not scrape the Site, republish doorway content, misrepresent your relationship with the Advisor, or use the Site to solicit anyone for any trading program.

8. Disclaimers and limitation of liability

The public Site is provided as-is. To the fullest extent the law allows, the Advisor disclaims all warranties about it and is not liable for any loss arising from your use of the public Site. Nothing in this section limits the Advisor's obligations to clients under the Commodity Exchange Act, CFTC regulations, NFA rules, or its Client Agreement.

9. Changes, governing law, contact

The Advisor may update these Terms by posting a new version with a new date. [STATE] law governs. Contact: [EMAIL] · [ADDRESS] · [PHONE].

[Counsel: confirm the "not a solicitation" framing against NFA Rule 2-29 and Compliance Rule 2-36 as applied to a CTA's public website; confirm that the public Site contains no promotional material requiring pre-approval, or route it through the Promotional Material Review Procedures.]

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.