

UNITED STATES OF AMERICA
Before the
COMMODITY FUTURES TRADING COMMISSION

**In the Matter of Persons Failing to Comply with a Special Call Pursuant to
Commission Regulation 4.13(c)(1)(iii)**

**ORDER DEEMING INEFFECTIVE CERTAIN EXEMPTIONS FROM
COMMODITY POOL OPERATOR REGISTRATION
PURSUANT TO COMMISSION REGULATION 4.13(a)(2)**

WHEREAS, pursuant to Commission Regulation 4.13(a)(2), 17 C.F.R. § 4.13(a)(2), a person is not required to register with the Commission as a commodity pool operator if: (i) none of the pools it operates has more than 15 participants at any time; and (ii) the total gross capital contributions the person receives for units of participation in all of the pools it operates or that it intends to operate do not in the aggregate exceed \$400,000 (“Exemption”).

WHEREAS, pursuant to Commission Regulation 4.13(b)(1), 17 C.F.R. § 4.13(b)(1), a person claims the Exemption by filing with the National Futures Association a notice that includes, among other things, the name of the pool for which it is claiming the Exemption and a representation that the pool will be operated in accordance with the criteria for qualifying for the Exemption (“Notice”).

WHEREAS, pursuant to Commission Regulation 4.13(c)(1)(iii), 17 C.F.R. § 4.13(c)(1)(iii), each person who has filed a Notice (“Filer”) must submit to such special calls as the Commission may make to demonstrate eligibility for and compliance with the applicable criteria for exemption under Commission Regulation 4.13.

WHEREAS, following a review of current Notices, the Commission sought to

verify the eligibility of Filers for the Exemption.

WHEREAS, on March 11, 2020, the Commission issued an order providing that on or before April 10, 2020, the Director of the Division of Swap Dealer and Intermediary Oversight (“Director”), and such members of the Commission’s staff acting under the Director’s direction as he may designate, shall initiate a special call of a subset of Filers to be selected by the Director in order to demonstrate their eligibility for the Exemption and compliance with the applicable criteria in Commission Regulation 4.13.

WHEREAS, on April 6, 2020, the Director initiated a special call with respect to the following seventeen entities (collectively, “Selected Filers”):

1. 123 SAHN RHW (NFA ID 0526930)
2. AE GLOBAL LIMITED (NFA ID 0526885)
3. AMTO SECURITIES LTD (NFA ID 527105)
4. ASFX CAPITAL LIMITED (NFA ID 0527184)
5. BEST TRADER TECHNOLOGY LIMITED (NFA ID 0528802)
6. BONUS FINANCE PTY LTD (NFA ID 0527005)
7. DPI INTERNATIONAL PTY LTD (NFA ID 0527370)
8. FXZOOM GLOBAL CO LTD (NFA ID 0528601)
9. GLOBAL NEW TRADE LIMITED (NFA ID 0528602)
10. HUIYING GLOBAL PTY LIMITED (NFA ID 0526884)
11. INTAN TECHNOLOGY CO LTD (NFA ID 0527038)
12. JAG MARKETS LIMITED (NFA ID 0528360)
13. MANOVITCH GROUP CO LIMITED (NFA ID 0527731)
14. PHIL INTERNATIONAL LIMITED (NFA ID 0527824)

15. POCKETECH PTY LTD (NFA ID 0526887)

16. YESJAL KSIAL LIMITED (NFA ID 0529048)

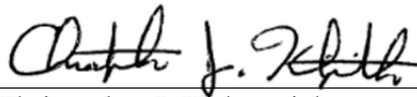
17. YOLYD LIMITED (NFA ID 0527036)

WHEREAS, as of the date of this ORDER, none of the Selected Filers has responded to the special call and demonstrated its eligibility for and compliance with the applicable criteria for an Exemption.

IT IS HEREBY ORDERED that the Commission deems each Selected Filer's claimed Exemption ineffective.

Issued in Washington, D.C., this 7th day of July 2020.

By the Commission.

A handwritten signature in black ink, appearing to read "Christopher J. Kirkpatrick", written over a horizontal line.

Christopher J. Kirkpatrick
Secretary of the Commission