



**Trading Central Americas, Inc.**  
**11 Bis Rue Scribe**  
**Paris, France 75009**  
**Tel + 331 5528 8040**  
**Fax + 331 5528 8049**  
**[www.tradingcentral.com](http://www.tradingcentral.com)**

This brochure was last updated on March 5, 2013

This brochure provides information about the qualifications and business practices of Trading Central Americas, Inc. ("Trading Central"). If you have any questions about the contents of this brochure, please contact us at the number listed above or at **[admin@tradingcentral.com](mailto:admin@tradingcentral.com)**. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Trading Central is registered with the SEC as an investment adviser; however, such registration does not imply a certain level of skill or training.

Additional information about Trading Central is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## TABLE OF CONTENTS\*

|    |  |   |
|----|--|---|
| A. | ADVISORY BUSINESS .....  | 1 |
|    | 1. Background .....  | 1 |
|    | 2. Services Provided .....   | 1 |
| B. | FEEES AND COMPENSATION .....   | 1 |
| C. | PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....                                       | 2 |
| D. | TYPES OF CLIENTS .....   | 2 |
| E. | METHODS OF ANALYSIS, INVESTMENT STRATEGIES<br>AND RISK OF LOSS .....                           | 2 |
| F. | DISCIPLINARY INFORMATION .....   | 3 |
| G. | OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....                                     | 3 |
| H. | CODE OF ETHICS, PARTICIPATION OR INTEREST IN<br>CLIENT TRANSACTIONS AND PERSONAL TRADING ..... | 3 |
| I. | BROKERAGE PRACTICES .....  | 3 |
| J. | REVIEW OF ACCOUNTS .....   | 4 |
| K. | CLIENT REFERRALS AND OTHER COMPENSATION .....  | 4 |
| L. | CUSTODY .....  | 4 |
| M. | INVESTMENT DISCRETION .....  | 4 |
| N. | VOTING CLIENT SECURITIES .....   | 4 |
| O. | FINANCIAL INFORMATION.....   | 4 |

---

\* A NOTE ABOUT THE FORMAT OF THIS BROCHURE: The SEC requires all investment advisers to organize their disclosure documents according to specific categories, some of which may not pertain to a particular adviser's business. Where a required category is not relevant to our business, we list the category and state that it does not apply.

## **A. ADVISORY BUSINESS**

### **1. Background**

Founded in 2006, Trading Central Americas, Inc. ("Trading Central" or the "Firm") is an independent research firm providing chartist and mathematical research and advice on equity, index, fixed-income, foreign currency and commodities products. The principal owner of Trading Central is Trading Central SA.

### **2. Services Provided**

The following is a description of the services offered by Trading Central:

**Trading Central Technical Analysis Research:** This is a timing service based upon technical analysis applied to different asset classes and investment horizons, and is focused on providing technical analysis and commentaries (chartist and technical indicators) regarding various financial and investment products including equities, indices, fixed-income securities, foreign currencies and commodities.

**Trading Central Trade Ideas and Trading Central Live Analysts:** Trade Ideas provides directional scenarios on specific financial instruments with entry and exit prices used to determine stop-loss and profit-taking levels. Trade Ideas is available online and sent to subscribers via email. The Live Analysts service allows users to email specific questions (on any underlying, ratio, spread or complex trading structure) to our analysts and get appropriate answers from them based upon technical analysis.

Trading Central's advice is non-discretionary; Trading Central does not manage portfolios, vote proxies or exercise any form of investment discretion over clients' accounts.

## **B. FEES AND COMPENSATION**

Fees for the Trading Central timing service correspond to market coverage requested by the client and the scope of the distribution license. For financial websites and market professionals, prices range from U.S. \$10,000 to U.S. \$25,000 per month. Volume discounts are available.

Fees for Trading Ideas and Live Analysts services range from U.S. \$10,000 to U.S. \$25,000 per month depending on the number of users in one given financial company. Volume discounts are negotiable.

All clients are billed quarterly in advance. Subscription agreements are usually for one or two years. Clients may terminate services at the end of each contracted period. For most of the services discussed above the Firm charges a subscription fee. For these subscription based services, the Firm's policy is not to provide refunds for prepaid services. For other services, the Firm charges a fixed fee. In the event a

client terminates fixed fee services, the fees will be pro-rated and a refund provided based on the number of days services were rendered. The Firm sometimes offers services on a trial basis.

### ***C. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT***

This item does not pertain to Trading Central's business.

### ***D. TYPES OF CLIENTS***

The Trading Central timing service targets two different market segments: (1) Financial websites (online banks and brokers, portals, etc.). The service is directly integrated as an XML feed into the client's website or can be packaged in a newsletter format (HTML or PDF); (2) Market professionals (buy-side and sell-side) and third party vendors (e.g., Bloomberg (GURU< GO> ) and Reuters (GURU enter)). The service is also available to be delivered in a newsletter, for internal and/or external distribution.

The Trading Central Trade Ideas and Live Analysts products are available to market professionals only.

Trading Central clients may include banks or thrift institutions, investment companies, broker-dealers, investment advisers and foreign exchange service providers.

### ***E METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS***

Trading Central's primary source of information is charts (historical price and volume information) on publicly traded financial instruments (equities, indices, foreign currencies, fixed-income securities, futures and commodities).

Trading Central does not manage accounts or select the investment strategies to be used by the client.

Trading Central supplies charts and technical analysis through the services identified above to independent market professionals and others. Technical analysis attempts to take into account psychological and other human factors in determining the likely future behavior of security prices. Technical analysis does not aim by itself to determine the specific reasons for variations in the price or value of any security. Technical analysis may fail to account for certain material factors which may have affected or may in the future affect the securities, industries or markets involved. Technical analysis should not be regarded as a comprehensive evaluation of any industry, company or security.

## ***F. DISCIPLINARY INFORMATION***

There are no legal or disciplinary events involving Trading Central that are material to a client's or a prospective client's evaluation of Trading Central's advisory business or the integrity of its management.

## ***G. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS***

Applicant has entered into arrangements with its foreign investment advisory affiliates, i.e. Trading Central SA, Trading Central Asia Limited, and Trading Central International LTD, whereby designated employees of the foreign affiliates may render investment advice to Trading Central's clients, solely under Trading Central's auspices. The foreign affiliates which share personnel with Trading Central under such arrangements are not registered as investment advisers in the United States. Each individual foreign employee who renders advice to Trading Central's clients shall be deemed a supervised person of Trading Central and shall be subject to the same Code of Ethics which governs the activities of Trading Central's own employees.

Each of Trading Central's foreign advisory affiliates whose employees render advice to Trading Central's clients has agreed to maintain certain books and records in accordance with the Investment Advisers Act of 1940 and to submit to the jurisdiction of U.S. regulatory authorities and courts with regard to the investment advice rendered to U.S. clients. Such foreign advisory affiliates may recommend to their own clients securities that are the subject of advice rendered to Trading Central clients.

## ***H. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING***

Trading Central has adopted a Code of Ethics expressing the Firm's commitment to ethical conduct. Trading Central does not buy or sell securities for its own account. Furthermore, the Firm's employees and supervised persons are generally prohibited from entering into securities transactions in securities for which Trading Central issues recommendations. On a quarterly basis, supervised persons must report their personal securities trades to the Chief Compliance Officer. Any individual who fails to comply with the Code of Ethics may be subject to discipline. Trading Central will provide a complete copy of its Code of Ethics to any client or prospective client upon request.

## ***I. BROKERAGE PRACTICES***

From time-to-time Trading Central may identify to clients the broker-dealers who are willing to provide Trading Central's research services to clients through soft-dollar arrangements. In such a situation, Trading Central acts as a third-party research

provider in the client's soft-dollar arrangements with the client's broker-dealer and receives cash payments from such broker-dealer in consideration for providing services to that client. However, all brokerage selection decisions remain the sole responsibility of the client. We do not believe such situations involve any conflicts between Trading Central's interests and those of our clients who choose to pay in this fashion.

***J. REVIEW OF ACCOUNTS***

This item does not apply to Trading Central's business.

***K. CLIENT REFERRALS AND OTHER COMPENSATION***

Please refer to Section I above.

***L. CUSTODY***

This item does not apply to Trading Central's business.

***M. INVESTMENT DISCRETION***

This item does not apply to Trading Central's business.

***N. VOTING CLIENT SECURITIES***

This item does not apply to Trading Central's business.

***O. FINANCIAL INFORMATION***

This item does not apply to Trading Central's business.