

FILED

BEFORE THE
BUSINESS CONDUCT COMMITTEE

FEB - 8 2012

In the Matter of:

CURRENSEE, INC.
(NFA ID #403251)

Respondent.

NATIONAL FUTURES ASSOCIATION
LEGAL DOCKETING

NFA Case No. 11-BCC-042

DECISION

Having reviewed the Complaint issued by this Committee in the above-captioned case, and having considered the Offer of Settlement ("Offer") submitted by Currensee, Inc. ("Currensee") and having accepted the Offer, this Committee hereby issues this Decision as to Currensee.

I

ALLEGED VIOLATIONS OF NFA REQUIREMENTS

On December 23, 2011, this Committee issued a Complaint against Currensee, an independent introducing broker Member of National Futures Association ("NFA"). The Complaint alleged that Currensee failed to implement an adequate anti-money laundering ("AML") program, in violation of NFA Compliance Rule 2-9(c), by failing to conduct a timely and sufficiently independent audit of its AML program.

II

OFFER OF SETTLEMENT

Currensee submitted an Offer to this Committee in which, without admitting or denying the allegations of the Complaint, it agreed to pay a fine of \$10,000 to NFA, payable within 30 days of the date of a Decision accepting its Offer.

III

FINDINGS

Pursuant to the Offer submitted by Currensee, this Committee finds that Currensee failed to have its first AML audit conducted by a regulatory compliant independent person or in a timely fashion, in violation of NFA Compliance Rule 2-9(c). The Committee also finds that, notwithstanding the allegations in paragraph 8 of the Complaint, Currensee did provide ongoing training with regard to AML for all appropriate personnel annually and maintained records of its compliance with this requirement.

IV

PENALTY

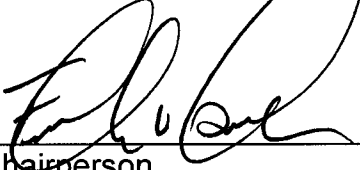
The Hearing Panel hereby orders Currensee to pay a fine of \$10,000 to NFA within 30 days of the date of this Decision.

This Decision shall operate to bar any future Member Responsibility Actions or Business Conduct Committee Complaints against Currensee for any conduct occurring prior to the date of its Offer, of which NFA had corporate knowledge; and shall resolve and terminate all complaints, investigations and audits relating to Currensee, which were pending as of the date of its Offer. In addition, Currensee's Offer and this Decision shall not be used as a sole basis for any other action or proceeding by NFA against Currensee, including any registration matter, except Currensee's Offer and this Decision may be used in an action to enforce their terms or in a subsequent disciplinary

action or regulatory action against Currensee, where they may be considered as disciplinary history and evidence in aggravation on the issue of sanctions.

**NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE**

Date: 2-8-12

By: 
Chairperson

/ham(BCC Decision/Currensee)

AFFIDAVIT OF SERVICE

I, Nancy Miskovich-Paschen, on oath state that on February 8, 2012, I served a copy of the attached Decision, by sending such copy by e-mail and messenger service, in an envelope addressed as follows to:

Kathryn M. Trkla, Esq.
Foley & Lardner LLP
321 North Clark Street
Suite 2800
Chicago, IL 60654-5313
E-mail: ktrkla@foley.com

and sending such copies by e-mail to:

David Stawick
Office of the Secretariat
Commodity Futures Trading
Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
E-mail: dstawick@cftc.gov

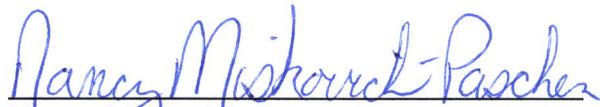
Richard Foelber
Division of Enforcement
Commodity Futures Trading
Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
E-mail: rfoelber@cftc.gov

Thomas Smith
Deputy Director
Compliance & Registration, DCIO
Commodity Futures Trading
Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
E-mail: tsmith@cftc.gov

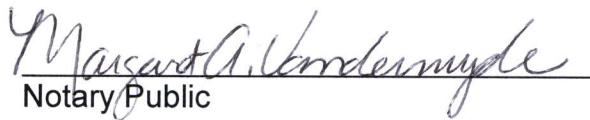
Tempest Thomas
Proceedings Clerk
Office of Proceedings
Commodity Futures Trading
Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
E-mail: tthomas@cftc.gov

and by hand delivery to:

Heather M. O'Hara, Esq.
National Futures Association
300 South Riverside Plaza
Suite 1800
Chicago, IL 60606


Nancy Miskovich-Paschen

Subscribed and sworn to before me
on this 8th day of February 2012


Notary Public

