NATIONAL FUTURES ASSOCIATION
BEFORE THE
BUSINESS CONDUCT COMMITTEE

FILED

APR 21 2010

NATIONAL FUTURES ASSOCIATION
LEGAL DOCKETING

In the Matter of:	)	
	)	
WINDSOR WEALTH MANAGEMENT LLC,	)	
et al.	)	
(Windsor Wealth Management LLC,	)	NFA CASE NO. 10-BCC-013
NFA ID #395924),	)	
	)	
Respondents.	)	

DECISION

Having reviewed the Complaint issued by the Business Conduct Committee ("Committee") of National Futures Association ("NFA") in the above-captioned case, and having considered the Offer of Settlement ("Offer") submitted by Windsor Wealth Management LLC ("Windsor Wealth Management") and having accepted its Offer, this Committee issues this Decision as to Windsor Wealth Management only.

I

ALLEGED VIOLATIONS OF NFA REQUIREMENTS

On April 21, 2010, the Committee issued a Complaint against Windsor Wealth Management, an introducing broker Member of NFA located in Boca Raton, Florida. The Complaint also named the principals and several of the associated persons of Windsor Wealth Management.

The Complaint alleged that Windsor Wealth Management failed to list Anthony Bobba ("Bobba") as a principal of the firm in violation of NFA Registration Rule 208; provided false information to NFA regarding Bobba's role at the firm and the

compensation paid to him and failed to disclose customer complaints to NFA, in violation of NFA Compliance Rule 2-2(f); failed to calculate net capital properly and failed to maintain required minimum adjusted net capital, in violation of NFA Financial Requirement Section 5; failed to maintain current books and records, in violation of NFA Compliance Rule 2-10; allowed equity withdrawals when the firm's adjusted net capital was under the equity withdrawal restriction, in violation of NFA Financial Requirement Section 4; failed to uphold high standards of commercial honor and just and equitable principles of trade by engaging in deceptive trading practices designed to generate commissions for the firm to the detriment of customers and engaging in fraudulent trading activity in the firm's error account, in violation of NFA Compliance Rule 2-4; and failed to supervise its brokers' dealings with customers and the trade recommendations they made to customers to ensure that they did not cause harm to customers and complied with NFA Requirements, in violation of NFA Compliance Rule 2-9.

II

OFFER OF SETTLEMENT

Windsor Wealth Management submitted an Offer in which it proposed to settle the charges against it by agreeing to withdraw from NFA membership, effective on the date of a Decision accepting its Offer and, thereafter, be permanently barred from NFA membership and from acting as a principal of an NFA Member.

III

FINDINGS

Having considered the matter and having accepted the Offer submitted by Windsor Wealth Management, this Committee finds that, as alleged in the Complaint

and described in Section I above, Windsor Wealth Management failed to list Anthony Bobba as a principal of the firm, in violation of NFA Registration Rule 208; provided false information to NFA regarding Bobba's role at the firm and the compensation paid to him and failed to disclose customer complaints to NFA, in violation of NFA Compliance Rule 2-2(f); failed to calculate net capital properly and failed to maintain required minimum adjusted net capital, in violation of NFA Financial Requirement Section 5; failed to maintain current books and records, in violation of NFA Compliance Rule 2-10; allowed equity withdrawals when the firm's adjusted net capital was under the equity withdrawal restriction, in violation of NFA Financial Requirement Section 4; failed to uphold high standards of commercial honor and just and equitable principles of trade by engaging in deceptive trading practices designed to generate commissions for the firm to the detriment of customers and engaging in fraudulent trading activity in the firm's error account, in violation of NFA Compliance Rule 2-4; and failed to supervise its brokers' dealings with customers and the trade recommendations they made to customers to ensure that they did not cause harm to customers and complied with NFA Requirements, in violation of NFA Compliance Rule 2-9.

IV

PENALTIES

Having considered the matter and having accepted the Offer submitted by Windsor Wealth Management, this Committee orders Windsor Wealth Management to withdraw from NFA membership, effective on the date of this Decision and, thereafter, be permanently barred from NFA membership and from acting as a principal of an NFA Member.

This Decision accepting Windsor Wealth Management's Offer shall operate to bar any future Member Responsibility Action or BCC Complaints against Windsor Wealth Management for any conduct occurring prior to the date of its Offer, of which NFA had corporate knowledge; and resolve and terminate all complaints, investigations and audits, relative to Windsor Wealth Management, which were pending as of the date of its Offer. Windsor Wealth Management's Offer and this Decision accepting its Offer shall not be used as a sole basis for any other action or proceeding by NFA against Windsor Wealth Management, including any registration matter, except its Offer and this Decision accepting its Offer may be used in an action to enforce their terms.

NATIONAL FUTURES ASSOCIATION
HEARING PANEL

Date: 04/21/2010

By: _____
Chairperson

m/rvh/Windsor Wealth Management Decision

AFFIDAVIT OF SERVICE

I, Nancy Miskovich-Paschen, on oath state that on April 21, 2010, I served copies of the attached Decision, by sending such copies in the United States Mail, postage prepaid, certified mail, return receipt requested, and by regular mail, first-class delivery, in envelopes addressed as follows:

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Nancy Miskovich-Paschen

Nancy Miskovich-Paschen

Subscribed and sworn to before me
on this 21st day of April 2010.

Mary A. Patton

Notary Public

OFFICIAL SEAL
MARY A PATTON
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 8/28/2013