NATIONAL FUTURES ASSOCATION BEFORE THE BUSINESS CONDUCT COMMITTEE

In the matter of:	·
BREWER FUTURES GROUP LLC (NFA ID #300729),	NFA Case No. 06-BCC-P08ECEIVED
And	JUL 1 1 2006
STEVEN J. BREWER (NFA ID #246323),	GENERAL COUNSEL'S OFFICE

ANSWERS TO COMPLAINT

NOW COMES Respondents Steven J. Brewer and the Brewer Futures Group, LLC, ("BFG") by and through their attorneys, James B. Koch and Gardiner Koch & Weisberg, and for their Answers to Complaint states as follows:

ALLEGATIONS

JURISDICTION

- 1. Respondents admit the allegations of paragraph 1.
- 2. Respondents admit the allegations of paragraph 2.

BACKGROUND

- 3. Respondents admit the allegations of paragraph 3.
- 4. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 4.

APPLICABLE RULES

- 5. Respondents admit the allegations of paragraph 5.
- 6. Respondents admit the allegations of paragraph 6.
- Respondents admit the allegations of paragraph 7.

- Respondents admit the allegations of paragraph 8.
- 9. Respondents admit the allegations of paragraph 9.
- Respondents admit the allegations of paragraph 10.

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COUNT I

VIOLATION OF NFA COMPLIANCE RULE 2-13(a): FAILURE TO FILE AND DISTRIBUTE POOL STATEMENTS

- 11. Respondents re-allege and reincorporate here in its answers to paragraphs 1-10.
- Respondents admit the allegations of paragraph 12.
- 13. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 13.
- 14. Respondents admit that BFG is charged with violations of the NFA

 Compliance Rule 2-13(a). However, Respondents deny that they have violated said rule.

COUNT II

VIOLATION OF NFA COMPLIANCE RULES 2-29(b)(5) AND 2-29(e): FAILURE TO MAINTAIN SUPPORT FOR PERFORMANCE DATA IN PROMOTIONAL MATERIAL AND FAILURE TO REVIEW AND APPROVE PROMOTIONAL MATERIAL

- 15. Respondents re-allege and reincorporate here in its answers to paragraphs 1-14.
- 16. Respondents admit the allegations of paragraph 16.
- 17. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 17.
- 18. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 18.
- 19. Respondents admit that BFG is charged with violations of the NFA

Compliance Rule 2-29(b)(5) and 2-29(e). However, Respondents deny that they have violated said rules.

COUNT III

VIOLATION OF NFA COMPLIANCE RULE 2-10: FAILURE TO MAINTAIN REQUIRED BOOKS AND RECORDS

- 20. Respondents re-allege and reincorporate here in its answers to paragraphs 1-19.
- 21. Respondents admit the allegations of paragraph 21.
- 22. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 22.
- 23. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 23.
- 24. Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 24.
- 25. Respondents admit that BFG is charged with violations of the NFA

 Compliance Rule 2-10. However, Respondents deny that they have violated said
 rule.

COUNT IV

VIOLATION OF NFA COMPLAINCE RULE 2-9(c): FAILURE TO IMPLEMENT AN ADEQUATE ANTI-MONEY LAUNDERING PROGRAM

- 26. Respondents re-allege and reincorporate here in its answers to paragraphs 1-25.
- Respondents lack sufficient knowledge or information to admit or deny the allegations in paragraph 27.
- 28. Respondents admit that BFG is charged with violations of the NFA

Compliance Rule 2-9(c). However, Respondents deny that they have violated said rule.

COUNT Y

VIOLATION OF NFA COMPLIANCE RULE 2-9(a): FAILURE TO SUPERVISE

- 29. Respondents re-allege and reincorporate here in its answers to paragraphs 1-28.
- 30. Respondents admit the allegations of paragraph 30.
- 31. The answers contained in paragraphs 12, 13, 16-19, 22-25, and 28 are re-alleged as answers to paragraph 31.
- 32. Respondents admit that BFG is charged with violations of the NFA

 Compliance Rule 2-9(a). However, Respondents deny that they have violated said rule.

WHEREFORE, Respondents respectfully request a Hearing in this matter.

Respectfully submitted,

Steven Brewer & Brewer Futures Group

By: James Block
One of His Attorneys

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