

SEP 16 2009

NATIONAL FUTURES ASSOCIATION
BEFORE THE
BUSINESS CONDUCT COMMITTEE

NATIONAL FUTURES ASSOCIATION
LEGAL DOCKETING

In the Matter of:)	
)	
TRUE VECTOR TRADING GROUP LLC)	
(NFA ID #383441))	
)	
and)	NFA Case No. 09-BCC-010
)	
JAMES DOUGLAS)	
(NFA ID #320266),)	
)	
Respondents.)	

DECISION

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee ("Committee") of National Futures Association ("NFA") against True Vector Trading Group LLC ("True Vector") and James Douglas ("Douglas") in the above-captioned proceeding, and having found that True Vector and Douglas were duly served with the Complaint and that they did not file an Answer to the Complaint, the Committee hereby issues the following Decision as to True Vector and Douglas.

I

ALLEGED VIOLATIONS OF NFA REQUIREMENTS

On June 10, 2009, the Committee issued a Complaint against True Vector, an introducing broker Member of NFA, and Douglas, an associated person ("AP") of True Vector and a listed principal as well as an NFA Associate, which alleged that True Vector and Douglas made misleading sales solicitations and failed to uphold high standards of commercial honor and just and equitable principles of trade by having

customers sign account opening documents in blank and completing them with inaccurate information, in violation of NFA Compliance Rules 2-2(a), 2-29(a)(1), and 2-4. The Complaint also alleged that True Vector and Douglas failed to implement an adequate anti-money laundering program, in violation of NFA Compliance Rule 2-9(c); and failed to diligently supervise employees and agents in the conduct of their commodity futures activities, in violation of NFA Compliance Rule 2-9(a).

II

FAILURE TO RESPOND

As required under NFA Compliance Rule 3-3(a), the Complaint was served on True Vector and Douglas by first-class mail and overnight delivery to the last addresses that they had provided to NFA. Pursuant to NFA Compliance Rules 3-4 and 3-6, True Vector and Douglas were given notice in the Complaint that they were required to file a written Answer to the Complaint with NFA within thirty days. True Vector and Douglas were further informed in the Complaint that a failure to file an Answer would be deemed to be an admission by True Vector and Douglas of the facts and legal conclusions alleged in the Complaint and a waiver of their right to a hearing.

True Vector and Douglas failed to respond to the Complaint in any way and NFA, subsequently, sent another copy of the Complaint to True Vector and Douglas, along with a reminder letter that noted that they had not filed a timely Answer, and that under NFA Compliance Rule 3-4, their failure to answer would be deemed to be an admission by them of all of the allegations of the Complaint and a waiver of their right to a hearing. The letter further informed True Vector and Douglas that if they intended to file an Answer they should do so within seven days. True Vector and Douglas have neither filed an Answer to the Complaint nor otherwise responded to it.

III

FINDINGS AND CONCLUSIONS

The Committee finds that True Vector and Douglas were duly served with the Committee's Complaint at the last addresses that they provided to NFA. The Committee further finds that True Vector and Douglas failed to answer the Complaint. Pursuant to NFA Compliance Rule 3-6(b), True Vector and Douglas are, therefore, deemed to have admitted the facts and legal conclusions alleged in the Complaint and to have waived their right to a hearing. Therefore, the Committee finds that True Vector and Douglas committed each and every violation alleged against them in the Complaint. Specifically, the Committee finds that True Vector and Douglas made misleading sales solicitations and failed to uphold high standards of commercial honor and just and equitable principles of trade by having customers sign account opening documents in blank and completing them with inaccurate information, in violation of NFA Compliance Rules 2-2(a), 2-29(a)(1), and 2-4. The Committee also finds that True Vector and Douglas failed to implement an adequate anti-money laundering program, in violation of NFA Compliance Rule 2-9(c); and failed to diligently supervise employees and agents in the conduct of their commodity futures activities, in violation of NFA Compliance Rule 2-9(a).

IV

PENALTY

Based on the serious nature of the violations in this case, which involved customer fraud, the Committee permanently bars True Vector from NFA membership and from acting as a principal of an NFA Member and permanently bars Douglas from

NFA membership and Associate membership and from acting as a principal of an NFA Member.

V

INELIGIBILITY

Pursuant to the provisions of Commodity Futures Trading Commission ("CFTC") Regulation 1.63, this Decision and the sanctions imposed herein render Douglas permanently ineligible to serve on a disciplinary committee, arbitration panel, oversight panel or governing board of any self-regulatory organization, as that term is defined in CFTC Regulation 1.63.

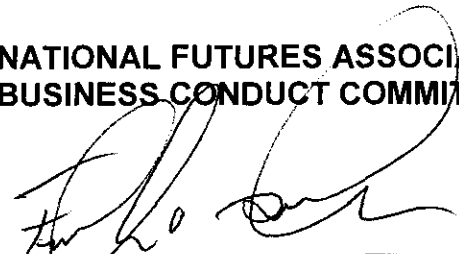
VI

APPEAL

True Vector and Douglas may appeal this Decision to the Appeals Committee of NFA by filing a written notice of appeal with NFA's Secretary within fifteen days of the date of this Decision. Pursuant to NFA Compliance Rule 3-13(a), the notice must describe those aspects of the disciplinary action to which exception is taken and must contain any request to present written or oral argument. This Decision shall be final after the expiration of the time for appeal or review, unless it is appealed or reviewed.

**NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE**

Date: 9-15-09

By: 
Chairperson

AFFIDAVIT OF SERVICE

I, Nancy Miskovich-Paschen, on oath state that on September 16, 2009, 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:

David Stawick
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and by hand delivery to:

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Nancy Miskovich-Paschen

Subscribed and sworn to before me
on this 16th day of September 2009.


Notary Public

