

**NATIONAL FUTURES ASSOCIATION
BEFORE THE
BUSINESS CONDUCT COMMITTEE**

In the Matter of:

NORTHSTAR COMMODITY
INVESTMENT CO. LLC
(NFA ID #232746),

Respondent.

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NFA Case No. 17-BCC-008

DECISION

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee (BCC or Committee) of National Futures Association (NFA) against Northstar Commodity Investment Co. LLC (Northstar), and having considered the Offer of Settlement (Offer) submitted by Northstar, and having accepted its Offer, this Committee hereby issues this Decision as to Northstar.

I

ALLEGED VIOLATIONS OF NFA REQUIREMENTS

On August 10, 2017, this Committee issued a Complaint against Northstar, an introducing broker and commodity trading advisor Member of NFA located in Minneapolis, Minnesota. The Complaint alleged that Northstar failed to supervise its operations and employees, in violation of NFA Compliance Rule 2-9(a), by failing to adequately monitor intra-day trade transfers made by its associated persons.

II

OFFER OF SETTLEMENT

Northstar – without admitting or denying the allegations of the Complaint – submitted an Offer in which it proposed to settle the charges against it by agreeing to pay

a fine of \$15,000 to NFA, which Northstar tendered along with its Offer. In its Offer, Northstar acknowledged that any Decision accepting its Offer would include findings that it committed the violations alleged in the Complaint.

III

FINDINGS

Pursuant to Northstar's Offer, the Committee finds that Northstar failed to adequately supervise its operations and employees, in violation of NFA Compliance Rule 2-9(a). In connection with such findings, the Committee acknowledges that Northstar – after learning of the conduct which formed the basis for the Complaint in this case – took prompt remedial action to implement new procedures to monitor intra-day trade transfers.

IV

PENALTY

Pursuant to the Offer, the Committee orders Northstar to pay a fine of \$15,000 to NFA, which fine Northstar has already paid in full.

The Complaint in this case as well as this Decision accepting Northstar's Offer may be offered as evidence in an action by NFA to enforce the terms thereof or in any subsequent disciplinary action or regulatory action by NFA where they may be offered as evidence in aggravation on the issue of sanctions.

**NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE**

Date:

08/10/2017

By:


Chairperson