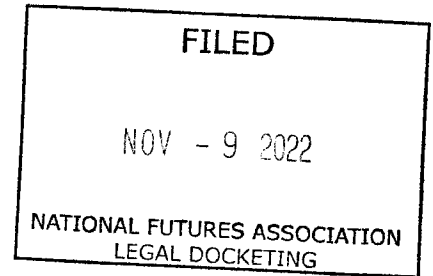


**NATIONAL FUTURES ASSOCIATION
BEFORE THE
BUSINESS CONDUCT COMMITTEE**



In the Matter of)
)
STAGE 5 TRADING CORP.)
(NFA ID #444666))
)
and)
)
ANTHONY GIACOMIN)
(NFA ID #407183),)
)
Respondents.)

NFA Case No. 22-BCC-014

DECISION

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee (Committee) of National Futures Association (NFA) and having considered the Offer of Settlement (Offer) submitted by Stage 5 Trading Corp. (Stage 5) and Anthony Giacomini (Giacomini), and having accepted their Offer, the Committee hereby issues this Decision as to Stage 5 and Giacomini.

I

ALLEGED VIOLATIONS OF NFA REQUIREMENTS

On September 30, 2022, this Committee issued a Complaint against Stage 5, an NFA Member introducing broker (IB) in Chicago, Illinois. The Complaint also named Giacomini as a Respondent. Giacomini is a principal, associated person (AP), and the sole owner of the firm, as well as an NFA Associate.

The Complaint charged Stage 5 with doing business with an unregistered forex IB, called Zulutrade International Limited (Zulutrade), in violation of NFA Compliance Rule 2-36(d), as incorporated through NFA Compliance Rule 2-39(a). The

Complaint also charged Stage 5 with using a website that did not distinguish clearly between Stage 5 and Zulutrade, which made the website misleading, in violation of NFA Compliance Rule 2-36(g), as incorporated through NFA Compliance Rule 2-39(a). Finally, the Complaint charged Stage 5 and Giacomini with failing to diligently supervise the firm's forex operations, in apparent violation of NFA Compliance Rule 2-36(e), as incorporated through NFA Compliance Rule 2-39(a).

II

OFFER OF SETTLEMENT

Without admitting or denying the allegations made against them in the Complaint, Stage 5 and Giacomini have submitted an Offer proposing to settle the charges against them by agreeing that Stage 5 would pay to NFA a fine of \$75,000, in accordance with the terms of the Offer. In making the Offer, Stage 5 and Giacomini acknowledged that any Decision issued by this Committee accepting the Offer would include the Committee's findings that they committed the alleged violations set forth in the Complaint.

III

FINDINGS

Pursuant to the Offer, the Committee finds that Stage 5 violated NFA Compliance Rules 2-36(d) and 2-36(g), as incorporated through NFA Compliance Rule 2-39(a); and that Stage 5 and Giacomini violated NFA Compliance Rule 2-36(e), as incorporated through NFA Compliance Rule 2-39(a).

IV

PENALTY

Having considered the matter and having accepted the Offer submitted by Stage 5 and Giacomini, this Committee hereby orders Stage 5 to pay to NFA a fine of \$75,000, in accordance with the terms of the Offer.

This Decision and the Offer shall not be used as a sole basis for any other action or proceeding by NFA against Stage 5 or Giacomini, including any registration matter, except that this Decision and the Offer may be used in an action to enforce the terms thereof or in a subsequent disciplinary action or regulatory action, where they may be considered as disciplinary history and as evidence in aggravation on the issue of sanctions.

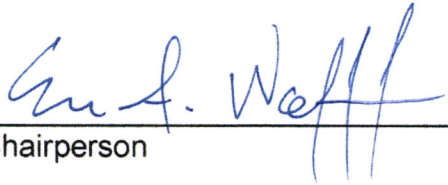
V

INELIGIBILITY

Pursuant to Commodity Futures Trading Commission (CFTC) Regulation 1.63, this Decision and the sanctions imposed herein render Giacomini 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, until the later of three (3) years after the effective date of this Decision, or until he has satisfied all the sanctions and conditions imposed by this Decision.

**NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE**

Date: 11/9/2022

By: 
Chairperson