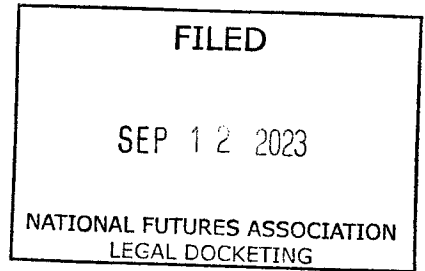


**NATIONAL FUTURES ASSOCIATION
BEFORE THE
BUSINESS CONDUCT COMMITTEE**



In the Matter of:

TRANSAMERICA ASSET
MANAGEMENT INC., ET AL.
(Quynh Pham Keiser, NFA ID #550489),

Respondent.

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NFA Case No. 23-BCC-005

DECISION

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee (this Committee) of National Futures Association (NFA) against Quynh Pham Keiser (Keiser) and having considered the Offer of Settlement (Offer) submitted by Keiser, and having accepted her Offer, this Committee hereby issues this Decision as to Keiser.

I

ALLEGED VIOLATION OF NFA REQUIREMENTS

On June 29, 2023, this Committee issued a Complaint against Keiser, a former NFA Associate and previous associated person of Transamerica Asset Management Inc., a commodity pool operator Member of NFA located in Denver, Colorado. The Complaint alleged that Keiser willfully submitted materially false or misleading information to NFA, in violation of NFA Compliance Rule 2-2(f), by altering the Series 3 proficiency examination certificate Keiser submitted to NFA in connection with her application for CFTC registration and NFA membership to reflect she had passed the Series 3 exam, when she had actually failed the exam.

II

OFFER OF SETTLEMENT

Without admitting or denying the allegations made against her in the Complaint, Keiser has submitted an Offer proposing to settle the charge against her by agreeing not to reapply for NFA associate membership, or apply for NFA membership or principal status with a Member, or act as a principal of a Member at any time in the future. Keiser acknowledged in the Offer that any Decision accepting the Offer would include a finding of the violation alleged against her in the Complaint.

III

FINDING

Pursuant to the Offer, this Committee finds that Keiser willfully submitted materially false or misleading information to NFA, in violation of NFA Compliance Rule 2-2(f), by altering the Series 3 proficiency examination certificate Keiser submitted to NFA in connection with her application for CFTC registration and NFA membership to reflect she had passed the Series 3 exam, when she had actually failed the exam.

IV

PENALTY

Having considered the matter and having accepted the Offer submitted by Keiser, this Committee hereby orders Keiser not to reapply for NFA associate membership, or apply for NFA membership or principal status with a Member, or act as a principal of a Member at any time in the future. This Decision and the Offer may be used in an action to enforce the terms thereof.

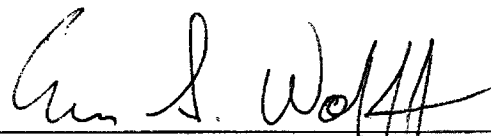
IV

INELIGIBILITY

Pursuant to Commodity Futures Trading Commission (CFTC) Regulation 1.63, this Decision and the sanctions imposed herein render Kesier 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.

**NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE**

Date: 9/12/2023

By: 
Chairperson