

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

FILED

JUL 26 2024

NATIONAL FUTURES ASSOCIATION
LEGAL DOCKETING

In the Matter of

CALIFORNIA MANAGED
ACCOUNTS, INC.
(NFA ID #187279),

and

ARTHUR PECK
BARTHOLOMEW III
(NFA ID #44758),

Respondents.

NFA Case No. 24-BCC-007

DECISION

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee (Committee) of National Futures Association (NFA) in the above-captioned case, having considered the Offer of Settlement (Offer) submitted by California Managed Accounts, Inc. (California Managed Accounts) and Arthur Peck Bartholomew III (Bartholomew), and having accepted the Offer, this Committee hereby issues this Decision as to California Managed Accounts and Bartholomew.

I

ALLEGED VIOLATIONS OF NFA REQUIREMENTS

On May 22, 2024, this Committee issued a Complaint against California Managed Accounts, an NFA Member introducing broker (IB) located in Novato, California. The Complaint also named Bartholomew as a Respondent. Bartholomew is

the president, an associated person and principal of California Managed Accounts, and an NFA Associate.

Count I of the Complaint alleged that California Managed Accounts failed to provide anti-money laundering (AML) training for appropriate personnel, in violation of NFA Compliance Rule 2-9(c). Count II of the Complaint alleged that California Managed Accounts failed to provide cybersecurity training for appropriate personnel, in violation of NFA Compliance Rule 2-9(a). Count II of the Complaint also alleged that California Managed Accounts and Bartholomew failed to supervise the firm's overall operations, in further violation of NFA Compliance Rule 2-9(a).

II

OFFER OF SETTLEMENT

California Managed Accounts and Bartholomew submitted an Offer in which they neither admitted nor denied the allegations set forth in the Complaint and proposed to settle the charges against them by paying a fine of \$10,000 to NFA, for which they shall be jointly and severally liable, payable in accordance with the terms of their Offer. In the Offer, California Managed Accounts and Bartholomew acknowledged that any Decision accepting their Offer would include findings that they committed the violations alleged against them in the Complaint.

III

FINDINGS

Pursuant to the Offer, this Committee finds that California Managed Accounts and Bartholomew violated NFA Compliance Rule 2-9(a), and that California Managed Accounts violated NFA Compliance Rule 2-9(c).

IV

PENALTY

Having considered the matter and having accepted the Offer submitted by California Managed Accounts and Bartholomew, this Committee orders California Managed Accounts and Bartholomew, jointly and severally, to pay a fine of \$10,000 to NFA, payable in accordance with the terms of their Offer.

This Decision and the Offer shall not be used as the sole basis for any other action or proceeding by NFA against California Managed Accounts or Bartholomew, including any registration matter, except 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.

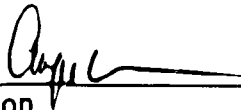
V

INELIGIBILITY

Pursuant to Commodity Futures Trading Commission (CFTC) Regulation 1.63, this Decision and the sanctions imposed herein render Bartholomew 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 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: 07/26/2024

By: 
Chairperson