

The Complaint alleged that Trinity Trading failed to create and maintain required records; failed to distribute disclosure documents, account statements and certified annual reports to pool participants; and commingled pool assets, in violation of NFA Compliance Rule 2-13(a). The Complaint also alleged that Trinity Trading permitted unregistered individuals to act as APs without being NFA Associates, in violation of NFA Bylaw 301(b); and failed to obtain NFA approval of individuals acting as forex APs, in violation of NFA Bylaw 301(j).

The Complaint further alleged that Trinity Trading and Schock failed to observe high standards of commercial honor and just and equitable principles of trade in dealings with Trinity Trading investors, in violation of NFA Compliance Rule 2-4. In addition, the Complaint alleged Trinity Trading and Schock used promotional materials that mentioned profit without the required discussion of risk of loss, and that contained video content that described future profit without submitting the materials to NFA for review and approval, in violation of NFA Compliance Rule 2-36(g), as incorporated through NFA Compliance Rule 2-39(a). Finally, the Complaint alleged Trinity Trading and Schock failed to supervise, in 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 set forth in the Complaint, Trinity Trading and Schock submitted an Offer in which they proposed to settle the charges against them on the following terms and conditions:

1. Trinity Trading agreed that it will not reapply for NFA membership or act as, or be listed as, a principal of an NFA Member at any time in the future; and

2. Schock agreed that he will not apply for NFA membership, reapply for NFA associate membership or act as, or be listed as, a principal of an NFA Member at any time in the future.

In their Offer, Trinity Trading and Schock 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, the Committee finds that Trinity Trading and Schock committed the violations alleged against them in the Complaint.

IV

PENALTY

Having considered the matter and having accepted the Offer submitted by Trinity Trading and Schock, the Committee hereby orders as follows:

1. Trinity Trading shall not reapply for NFA membership or act as, or be listed as, a principal of an NFA Member at any time in the future; and
2. Schock shall not apply for NFA membership, reapply for NFA associate membership or act as, or be listed as, a principal of an NFA Member at any time in the future.

This Decision and the Offer shall not be used as the sole basis for any other action or proceeding by NFA against Trinity Trading or Schock, except that this Decision and the Offer may be used in an action to enforce the terms thereof and as the basis for denying Trinity Trading and Schock NFA membership, NFA associate membership and/or principal status with an NFA Member.


V

INELIGIBILITY

Pursuant to Commodity Futures Trading Commission (CFTC) Regulation 1.63, this Decision and the sanctions imposed herein render Schock 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: 9/19/2024

By: 
Chair