

FILED

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

JUL 16 2025

**NATIONAL FUTURES ASSOCIATION
LEGAL DOCKETING**

In the Matter of:

MAREX SPECTRON
INTERNATIONAL LIMITED
(NFA ID #445699),

Respondent.

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NFA Case No. 25-BCC-008

COMPLAINT

Having reviewed the investigative report submitted by the Compliance Department of National Futures Association (NFA) and having found reason to believe that NFA Requirements are being, have been, or are about to be violated and that the matter should be adjudicated, NFA's Business Conduct Committee (Committee) issues this Complaint against Marex Spectron International Limited (Marex Spectron).

ALLEGATIONS

JURISDICTION

1. At all times relevant to this Complaint, Marex Spectron has been registered with the Commodity Futures Trading Commission (CFTC or Commission) as an introducing broker (IB) and approved as a Member of NFA. As such, Marex Spectron was and is required to comply with NFA Requirements and is subject to disciplinary proceedings for violations thereof.

BACKGROUND

2. Marex Spectron has been an IB Member and approved swap firm since October 2012. The firm is headquartered in London, United Kingdom and currently has branch offices in the United States (U.S.) and Canada.

3. Marex Spectron operates as a block futures broker for institutional customers trading energy and freight products on various exchanges in the U.S. and abroad. The firm's customers consist mainly of trading firms, institutional banks, and hedge funds located in the U.S. and other countries.
4. Based on the results of an examination conducted in 2020 (2020 exam), this Committee issued a Complaint against Marex Spectron in February 2022 that charged the firm with allowing 18 individuals to solicit and/or accept orders from customers located in the U.S. (U.S. customers) without being NFA Associates and registered with the CFTC as associated persons (APs) of the firm (2022 Complaint). The firm settled the 2022 Complaint and paid a fine of \$250,000 to NFA.
5. NFA commenced its most recent examination in June 2024 (2024 exam).
6. As alleged in more detail below, NFA's 2024 exam found Marex Spectron again permitted numerous individuals to solicit and/or accept orders from U.S. customers without being NFA Associates and registered with the CFTC as APs of the firm.

APPLICABLE RULES

7. NFA Bylaw 301(b) provides, in pertinent part, that no person may be associated with a Member of NFA unless the person is registered as an NFA Associate or is an NFA Member. As used in the Bylaw, the term "associated with a Member" means any person who is associated with a Member of NFA within the meaning of the term "associated person" as used in the Commodity Exchange Act or Commission Rules and who is required to be registered as such with the Commission.

8. CFTC Regulation 3.12(h)(1)(iv) provides an exemption from registration as an AP for an individual who engages in AP activities from a location outside the U.S., its territories or possessions and limits such AP activities to customers located outside the U.S., its territories or possessions.
9. NFA Compliance Rule 2-9(a) requires each Member to diligently supervise its employees and agents in the conduct of their commodity interest activities for or on behalf of the Member.

COUNT I

VIOLATIONS OF NFA BYLAW 301(b): ALLOWING INDIVIDUALS TO SOLICIT AND/OR ACCEPT ORDERS FROM CUSTOMERS LOCATED IN THE U.S. WITHOUT BEING NFA ASSOCIATES AND REGISTERED WITH THE CFTC AS ASSOCIATED PERSONS OF THE FIRM.

10. The foregoing paragraphs are realleged as if fully stated herein.
11. CFTC Regulation 1.3 provides, in pertinent part, that an AP is an individual associated with an IB who engages in the solicitation or acceptance of customer orders (or supervises any individual so engaged).
12. During the 2024 exam, NFA identified 14 individuals employed as brokers of Marex Spectron who were soliciting and/or accepting orders from U.S. customers without being NFA Associates and registered with the CFTC as APs of the firm.
13. All 14 of the individuals worked in the firm's energy division—the same division involved in the 2022 Complaint.
14. All 14 of the individuals worked in the firm's London office, except for one individual who worked in Dubai.
15. To determine whether these individuals' activities involved soliciting and/or accepting orders from U.S. customers, NFA reviewed organizational documents

(e.g., certificate of incorporation), written agreements and trade confirmations, among other documents Marex Spectron provided for each of the entities that appeared to be a U.S. customer.

16. These documents confirmed the customers consisted of corporations (or other legal entities) formed under the laws of the U.S. and/or which maintained their principal place of business in the U.S.
17. Therefore, Marex Spectron knew or should have known these 14 individuals were brokering trades with U.S. customers and did not qualify for the Regulation 3.12 exemption. As a result, the firm should have registered these individuals as NFA Associates and APs of the firm but did not.
18. The following example illustrates NFA's findings. According to Marex Spectron's March 4, 2024 trade blotter, one of the 14 individuals in London brokered a crude oil contract-for-difference (CFD) trade with a customer whose name was on the firm's list of U.S. clients (Customer 1). Marex Spectron's trade confirmation also listed Customer 1 as the "buyer" on the CFD trade, and a September 2022 limited liability company (LLC) document in the firm's records reported Customer 1 as an active Illinois LLC, headquartered in Chicago.
19. Therefore, Marex Spectron knew or should have known that the individual who brokered the CFD trade with Customer 1 did not qualify for the Regulation 3.12 exemption and should have been registered as an NFA Associate and AP of the firm but was not.
20. The 2024 exam revealed these 14 individuals brokered approximately 75 trades for 20 U.S. customers from February 1 to April 30, 2024 and accounted for about

40% (or 14 of 35) of the individuals employed as brokers in the firm's London energy division.

21. The 2024 exam also revealed these individuals continued to do business with many of the same U.S. customers that NFA had identified in the 2020 exam (which led to the 2022 Complaint).
22. Furthermore, Marex Spectron admitted that three of the individuals should have been registered but were not.
23. NFA had identified one of those individuals (Employee 1) in the 2020 exam, where he brokered trades with U.S. customers without being an NFA Associate and registered AP.
24. Although Marex Spectron represented during the 2020 exam that an individual registered as an AP of the firm would handle Employee 1's U.S. customer business, the firm admitted during the 2024 exam that Employee 1 had brokered over 50 trades for U.S. customers from June 2021 through June 2024, even though he was not an NFA Associate and registered AP of the firm.
25. Based on the foregoing, Marex Spectron permitted 14 individuals to solicit and/or accept orders from U.S. customers without being NFA Associates and registered as APs of the firm.
26. By reason of the foregoing acts and omissions, Marex Spectron is charged with violating NFA Bylaw 301(b).

COUNT II

VIOLATIONS OF NFA COMPLIANCE RULE 2-9(a): FAILING TO SUPERVISE.

27. The foregoing paragraphs are realleged as if fully stated herein.

28. Under NFA Compliance Rule 2-9(a), Marex Spectron is required to diligently supervise its employees and agents in the conduct of their commodity interest activities for or on behalf of the firm.
29. However, as alleged above, Marex Spectron fell short of fulfilling its supervisory obligations to ensure the firm complied with NFA Requirements applicable to registering individuals as NFA Associates and APs of the firm.
30. These supervision failures are especially troubling considering NFA's 2022 Complaint against the firm. Marex Spectron knew or should have known from the 2020 exam findings and related 2022 Complaint that the firm was obligated to comply with NFA Requirements related to registration of Associates.
31. However, the circumstances alleged above reveal that Marex Spectron failed to adequately remediate the deficiencies that led to the prior disciplinary case or implement effective procedures or controls to avoid repeating the same violations.
32. Marex Spectron further demonstrated its supervision failures by allowing Employee 1 to continue soliciting and/or accepting orders from U.S. customers since June 2021, even though he was not an NFA Associate and registered AP of the firm, and permitting numerous other unregistered individuals in the energy division to broker trades for many of the same U.S. customers NFA had identified in the 2020 exam.
33. By reason of the foregoing acts and omissions, Marex Spectron is charged with violating NFA Compliance Rule 2-9(a).

PROCEDURAL REQUIREMENTS

ANSWER

You must file a written Answer to the Complaint with NFA within thirty days of the date of the Complaint. The Answer shall respond to each allegation in the Complaint by admitting, denying, or averring that you lack sufficient knowledge or information to admit or deny the allegation. An averment of insufficient knowledge or information may only be made after a diligent effort has been made to ascertain the relevant facts and shall be deemed to be a denial of the pertinent allegation.

The place for filing an Answer shall be:

National Futures Association
320 South Canal
Suite 2400
Chicago, Illinois 60606
Attn: Legal Department-Docketing

E-Mail: Docketing@nfa.futures.org

Failure to file an Answer as provided above shall be deemed an admission of the facts and legal conclusions contained in the Complaint. Failure to respond to any allegation shall be deemed an admission of that allegation. Failure to file an Answer as provided above shall be deemed a waiver of hearing.

POTENTIAL PENALTIES, DISQUALIFICATION, AND INELIGIBILITY

At the conclusion of the proceedings conducted in connection with the issuance of this Complaint, NFA may impose one or more of the following penalties:

- (a) expulsion or suspension for a specified period from NFA membership;
- (b) bar or suspension for a specified period from association with an NFA Member;
- (c) censure or reprimand;

- (d) a monetary fine not to exceed \$500,000 for each violation found; and
- (e) order to cease and desist or any other fitting penalty or remedial action not inconsistent with these penalties.

The allegations in this Complaint may constitute a statutory disqualification from registration under Section 8a(3)(M) of the Commodity Exchange Act. A respondent in this matter who applies for registration in any new capacity, including as an AP with a new sponsor, may be denied registration based on the pendency of this proceeding.

**NATIONAL FUTURES ASSOCIATION
BUSINESS CONDUCT COMMITTEE**

Dated:

7/16/2025

By:

E. A. Wolff
Chairperson