# NATIONAL FUTURES ASSOCIATION BEFORE THE HEARING PANEL

**FILED** 

| In the Matter of                            | )  |
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| TRADERS EDGE INC.<br>(NFA ID #284329),      | ) ) NATIONAL PUTURES ASSOCIATION ) LEGAL DOCKETING |
| EDWARD FRANCIS CARR JR.<br>(NFA ID #30296), | )<br>)<br>)  |
| WILLIAM MICHAEL CHIECO<br>(NFA ID #276412), | ) NFA Case No. 24-BCC-011<br>)                     |
| and   | <b>)</b>   |
| EUGENE ANTHONY RATTI<br>(NFA ID #262344),   | )<br>)   |
| Respondents.                                | )  |
|   |  |

# **DECISION**

Having reviewed all matters relevant to the Complaint issued by the Business Conduct Committee (BCC) of National Futures Association (NFA) in the above-captioned case, having considered the Offer of Settlement (Offer) submitted by Traders Edge Inc. (Traders Edge), Edward Francis Carr Jr. (Carr), William Michael Chieco (Chieco) and Eugene Anthony Ratti (Ratti), and having accepted the Offer, the Hearing Panel (Panel) hereby issues this Decision as to Traders Edge, Carr, Chieco and Ratti.

## **ALLEGED VIOLATIONS OF NFA REQUIREMENTS**

On September 25, 2024, the BCC issued a Complaint against Traders Edge, an NFA Member introducing broker located in Madison, New Jersey. The Complaint also named Carr, Chieco and Ratti as a Respondents. Carr and Chieco are each associated persons (AP) and principals of Traders Edge and NFA Associates.

Ratti is a former NFA Associate and AP of Traders Edge.

Count I of the Complaint alleges that the firm's website displayed misleading and deceptive trading results that were not presented net of commissions and fees, in violation of NFA Compliance Rules 2-29(b)(1) and 2-29(b)(5). Count I of the Complaint also alleges that the firm's website included discussions about profit that were not accompanied by an equally prominent discussion of the risk of loss, in violation of NFA Compliance Rule 2-29(b)(3).

Count II of the Complaint alleges that Chieco, Ratti and Traders Edge (though its APs) engaged in misleading and deceptive sales solicitations, in violation of NFA Compliance Rules 2-2(a) and 2-29(a)(1). Count II of the Complaint also alleges that Traders Edge failed to adequately disclose fees to customers prior to the commencement of trading, in violation of NFA Compliance Rule 2-4.

Count III of the Complaint alleges that Traders Edge acted in the capacity of a commodity trading advisor without being registered as such, in violation of NFA Compliance Rule 2-2(i). Finally, Count IV of the Complaint alleges that Traders Edge and Carr failed to diligently supervise the firm's operations and employees, in violation of NFA Compliance Rule 2-9(a).

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#### OFFER OF SETTLEMENT

Without admitting or denying the allegations set forth in the Complaint,

Traders Edge, Carr, Chieco and Ratti have submitted a joint Offer in which they

proposed to settle the charges against them on the following terms and conditions:

 Traders Edge agreed to withdraw from NFA membership and, thereafter, not reapply for NFA membership or act as a principal of an NFA Member at any time in the future.

### 2. Carr agreed:

- to withdraw as a principal of Traders Edge and, thereafter, not act as a principal of an NFA Member or seek principal status with an NFA Member for a period of five years from the date of his withdrawal;
- ii. to withdraw from NFA associate membership and, thereafter, not reapply for NFA associate membership or apply for NFA membership for a period of 180 days from the date of his withdrawal;
- to pay a fine of \$40,000 to NFA if, after the expiration of the fiveyear or 180-day periods referenced above, he seeks principal status with an NFA Member, applies for NFA membership or reapplies for NFA associate membership, which fine is due and payable in full on or before the date of his application;
- iv. to acknowledge that NFA will not consider or approve any future application for principal status, NFA membership or NFA associate membership until he has paid the \$40,000 fine in full; and
- v. to adhere to undertakings, in accordance with a confidential letter agreement between NFA and Carr, executed in connection with the Offer.

# 3. Chieco agreed:

- to withdraw as a principal of Traders Edge and from NFA associate membership, and, thereafter, not seek principal status with an NFA Member, reapply for NFA associate membership or apply for NFA membership for a period of 60 days from the date of his withdrawal;
- ii. to pay a fine of \$5,000 to NFA if, after the expiration of the 60-day period referenced above, he seeks principal status with an NFA Member, applies for NFA membership or reapplies for NFA associate membership, which fine is due and payable in full on or before the date of his application; and
- iii. to acknowledge that NFA will not consider or approve any future application for principal status, NFA membership or NFA associate membership until he has paid the \$5,000 fine in full.

# 4. Ratti agreed:

- not to seek principal status with an NFA Member, reapply for NFA associate membership or apply for NFA Membership for a period of 30 days from the date of a Decision accepting the Offer;
- ii. to pay a fine of \$5,000 to NFA if, after the expiration of the 30-day period referenced above, he seeks principal status with an NFA Member, applies for NFA membership or reapplies for NFA associate membership, which fine is due and payable in full on or before the date of his application; and
- iii. to acknowledge that NFA will not consider or approve any future application for principal status, NFA membership or NFA associate membership until he has paid the \$5,000 fine in full.

In making their Offer, Traders Edge, Carr, Chieco and Ratti acknowledged that any Decision accepting their Offer would include findings that Traders Edge, Chieco and Ratti violated NFA Compliance Rules 2-2(a) and 2-29(a)(1), Traders Edge and Carr violated NFA Compliance Rule 2-9(a), and Traders Edge violated NFA Compliance Rules 2-4, 2-29(b)(1), 2-29(b)(3) and 2-29(b)(5), provided the Decision does not contain any findings that Traders Edge violated NFA Compliance Rule 2-2(i).

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#### **FINDINGS**

Pursuant to the Offer, this Panel finds that Traders Edge, Chieco and Ratti violated NFA Compliance Rules 2-2(a) and 2-29(a)(1), Traders Edge and Carr violated NFA Compliance Rule 2-9(a), and Traders Edge violated NFA Compliance Rules 2-4, 2-29(b)(1), 2-29(b)(3) and 2-29(b)(5).

#### **PENALTY**

Having considered the matter and having accepted the Offer submitted by

Traders Edge, Carr, Chieco and Ratti, this Panel orders as follows:

 Traders Edge shall withdraw from NFA membership within 30 days after the effective date of this Decision and, thereafter, not reapply for NFA membership or act as a principal of an NFA Member at any time in the future.

#### 2. Carr shall:

- i. withdraw as a principal of Traders Edge within 30 days after the effective date of this Decision and, thereafter, not act as a principal of an NFA Member or seek principal status with an NFA Member for a period of five years from the date of his withdrawal;
- ii. withdraw from NFA associate membership within 30 days after the effective date of this Decision and, thereafter, not reapply for NFA associate membership or apply for NFA membership for a period of 180 days from the date of his withdrawal;
- iii. pay a fine of \$40,000 to NFA if, after the expiration of the five-year or 180-day periods referenced above, he seeks principal status with an NFA Member, applies for NFA membership or reapplies for NFA associate membership, which fine is due and payable in full on or before the date of his application. NFA shall not consider or approve any future application for principal status, NFA membership or NFA associate membership until Carr has paid the \$40,000 fine in full; and
- adhere to undertakings, in accordance with a confidential letter agreement between NFA and Carr, executed in connection with the Offer.

#### 3. Chieco shall:

i. withdraw as a principal of Traders Edge and an NFA Associate within 30 days after the effective date of this Decision, and, thereafter, not seek principal status with an NFA Member, reapply for NFA associate membership or apply for NFA membership for a period of 60 days from the date of his withdrawal; and ii. pay a fine of \$5,000 to NFA if, after the expiration of the 60-day period referenced above, he seeks principal status with an NFA Member, applies for NFA membership or reapplies for NFA associate membership, which fine is due and payable in full on or before the date of his application. NFA shall not consider or approve any future application for principal status, NFA membership or NFA associate membership until Chieco has paid the \$5,000 fine in full.

#### 4. Ratti shall:

- not seek principal status with an NFA Member, reapply for NFA associate membership or apply for NFA membership for a period of 30 days from date of this Decision; and
- ii. pay a fine of \$5,000 to NFA if, after the expiration of the 30-day period referenced above, he seeks principal status with an NFA Member, applies for NFA membership or reapplies for NFA associate membership, which fine is due and payable in full on or before the date of his application. NFA shall not consider or approve any future application for principal status, NFA membership or NFA associate membership until Ratti has paid the \$5,000 fine in full.

This Decision and the Offer shall not be used as the sole basis for any other action or proceeding by NFA against Traders Edge, Carr, Chieco or Ratti, 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.

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#### <u>INELIGIBILITY</u>

Pursuant to Commodity Futures Trading Commission (CFTC) Regulation 1.63, this Decision and the sanctions imposed herein render Carr, Chieco and Ratti 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 they have satisfied all the sanctions and conditions imposed by this Decision.

NATIONAL FUTURES ASSOCIATION HEARING PANEL

Date: July 30, 2025

Chairperson