

website, in violation of NFA Compliance Rule 2-2(a). According to the Complaint, Metanoeo and Schuler engaged in conduct that led their customers to believe the information reported on the website reflected real trading that the firm and Schuler conducted in a futures account and actual net liquidating values that represented funds the customers could withdraw from the account, even though Schuler admitted the website information did not reflect an actual account or real trading. Count II of the Complaint charges Metanoeo and Schuler with willfully submitting materially false or misleading information to NFA by repeatedly reporting since 2021 that Metanoeo did not have any customers engaging in activity related to commodity interests, even though the firm has been active as a CTA since 2021, in violation of NFA Compliance Rule 2-2(f).

II

OFFER OF SETTLEMENT

Metanoeo and Schuler submitted an Offer in which they neither admitted nor denied the allegations of the Complaint and proposed to settle the charges against them on the following terms:

1. Metanoeo agreed to withdraw from NFA membership within 15 days after the date of any Decision accepting the Offer and, thereafter, not reapply for NFA membership or principal status with an NFA Member at any time in the future.
2. Schuler agreed to withdraw from NFA associate membership and as a principal of Metanoeo within 15 days after the date of any Decision accepting the Offer and, thereafter, not apply for NFA membership,

reapply for NFA associate membership, or act or be listed as a principal of an NFA Member at any time in the future.

III

PENALTY

Having considered the matter and having accepted the Offer submitted by Metanoeo and Schuler, this Committee hereby orders as follows:

1. Metanoeo shall withdraw from NFA membership within 15 days after the date of this Decision and, thereafter, shall not reapply for NFA membership or principal status with an NFA Member at any time in the future.
2. Schuler shall withdraw from NFA associate membership and as a principal of Metanoeo within 15 days after the date of this Decision and, thereafter, shall not apply for NFA membership, reapply for NFA associate membership, or act or be listed as a principal of an NFA Member at any time in the future.

This Decision and the Offer may be used as the sole basis for denying Metanoeo and Schuler NFA membership, NFA associate membership and/or principal status with an NFA Member.

IV

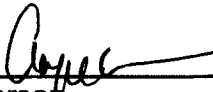
INELIGIBILITY

Pursuant to the provisions of CFTC Regulation 1.63, this Decision and the sanctions imposed herein render Schuler 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: 4/27/2026

By: 
Chairperson

m/cxc/Decisions/Metanoee et al Decision