

## BrokerCheck Report

### JAG TRADING L.L.C.

CRD# 114061

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Firm Profile	2 - 5
Firm History	6
Firm Operations	7 - 12
Disclosure Events	13



When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

## About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
  - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
  - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

• **Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at [brokercheck.finra.org](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit [www.finra.org](http://www.finra.org).



Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.  
This firm was formed in Delaware on 06/15/2001.  
Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 0 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 1 type of business.  
This firm is not affiliated with any financial or investment institutions.  
This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	4

JAG TRADING L.L.C.

CRD# 114061

SEC# 8-53408

Main Office Location

7125 ORCHARD LAKE RD.  
# 300  
WEST BLOOMFIELD, MI 48322  
Regulated by FINRA Chicago Office

Mailing Address

7125 ORCHARD LAKE RD.  
# 300  
WEST BLOOMFIELD, MI 48322

Business Telephone Number

248-757-2758



## Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 06/15/2001.

Its fiscal year ends in December.

## Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

### JAG TRADING L.L.C.

**Doing business as JAG TRADING L.L.C.**

**CRD#** 114061

**SEC#** 8-53408

### Main Office Location

7125 ORCHARD LAKE RD.

# 300

WEST BLOOMFIELD, MI 48322

**Regulated by FINRA Chicago Office**

### Mailing Address

7125 ORCHARD LAKE RD.

# 300

WEST BLOOMFIELD, MI 48322

### Business Telephone Number

248-757-2758



## Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	BAUER, CRAIG EVAN 4422849
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	MANAGING MEMBER, CCO
<b>Position Start Date</b>	06/2001
<b>Percentage of Ownership</b>	50% but less than 75%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	BAUER, ALANA ZORN
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	INVESTING MEMBER
<b>Position Start Date</b>	05/2006
<b>Percentage of Ownership</b>	25% but less than 50%
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	SLOAN, JACQUELINE LEE
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	FINANCIAL & OPERATIONS PRINCIPAL
<b>Position Start Date</b>	08/2001
<b>Percentage of Ownership</b>	Less than 5%

Firm Profile



Direct Owners and Executive Officers (continued)

Does this owner direct the management or policies of the firm? No

Is this a public reporting company? No

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## Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

## Indirect Owners

No information reported.



## Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.







Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

**This firm is currently registered with the SEC, 1 SRO and 0 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	08/21/2001

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	03/04/2024

## Firm Operations

### Registrations (continued)



## Firm Operations

### Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

**This firm currently conducts 1 type of business.**

### Types of Business

Trading securities for own account



## **Firm Operations**



### **Clearing Arrangements**

**This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).**

### **Introducing Arrangements**

**This firm does not refer or introduce customers to other brokers and dealers.**

## Firm Operations

### Industry Arrangements



**This firm does have books or records maintained by a third party.**

**Name:** JACQUELINE L. SLOAN, INC.  
**Business Address:** 111 W JACKSON  
# 1146  
CHICAGO, IL 60604  
**Effective Date:** 08/01/2001  
**Description:** APPLICANT'S BOOKS AND/OR RECORDS WILL BE HELD AND/OR MAINTAINED BY SLOAN, INC.

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**This firm does have accounts, funds, or securities maintained by a third party.**

**Name:** WEDBUSH SECURITIES INC.  
**CRD #:** 877  
**Business Address:** 1000 WILSHIRE BLVD  
LOS ANGELES, CA 90017  
**Effective Date:** 05/01/2018  
**Description:** WEDBUSH HOLDS AND MAINTAINS CASH AND/OR SECURITIES FOR THE FIRM.

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**Name:** GOLDMAN, SACHS & CO.  
**CRD #:** 361  
**Business Address:** 440 S LASALLE  
# 1600  
CHICAGO, IL 60605  
**Effective Date:** 01/01/2016  
**Description:** APPLICANTS FUNDS AND/OR SECURITIES AND OR BOOKS AND RECORDS MAY BE MAINTAINED BY GOLDMAN SACHS & CO.

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**This firm does not have customer accounts, funds, or securities maintained by a third party.**

#### Control Persons/Financing

**This firm does not have individuals who control its management or policies through agreement.**

**This firm does not have individuals who wholly or partly finance the firm's business.**



## Firm Operations

### Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

**This firm is not, directly or indirectly:**

- in control of
  - controlled by
  - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

**This firm is not directly or indirectly, controlled by the following:**

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	4	0



## Disclosure Event Details

### What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
  - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
  - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
  - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
    - A "pending" event involves allegations that have not been proven or formally adjudicated.
    - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
    - A "final" event has been concluded and its resolution is not subject to change.
  - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
    - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
    - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
    - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

### Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 4

**Reporting Source:** Regulator

**Current Status:** Final





**Allegations:** JAG TRADING L.L.C. VIOLATED CHX ARTICLE 6, RULE 12(C) (ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM), WHEN IT FAILED TO TIMELY CONDUCT INDEPENDENT ANTI-MONEY LAUNDERING ("AML") TESTING. THE FIRM'S CONDUCTED AN INDEPENDENT TEST OF ITS AML PROGRAM ON MAY 31, 2012. THE FIRM DID NOT CONDUCT ANOTHER INDEPENDENT AML TEST UNTIL AUGUST 29, 2014, WHICH WAS AFTER THE 2014 EXAMINATION OF THE FIRM HAD COMMENCED.

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 07/08/2015

**Docket/Case Number:** CHX-D-2015-02

**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:**

**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 07/08/2015

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Sanctions Ordered:** Monetary/Fine \$2,500.00

**Other Sanctions Ordered:**

**Sanction Details:** THE FULL FINE WAS LEVIED AGAINST THE FIRM AND IT WAS PAID IN FULL ON JULY 23, 2015.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** JAG TRADING LLC VIOLATED CHX ARTICLE 6, RULE 12(C) (ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM), WHEN IT FAILED TO TIMELY CONDUCT INDEPENDENT ANTI-MONEY LAUNDERING (AML) TESTING. THE FIRM'S CONDUCTED AN INDEPENDENT TEST OF ITS AML PROGRAM ON MAY 31, 2012. THE FIRM DID NOT CONDUCT ANOTHER INDEPENDENT AML



TEST UNTIL AUGUST 29, 2014, WHICH WAS AFTER THE 2014 EXAMINATION OF THE FIRM HAD COMMENCED AUGUST 29, 2014, WHICH WAS AFTER THE 2014 EXAMINATION OF THE FIRM HAD COMMENCED.

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 07/08/2015

**Docket/Case Number:** CHX-D--2015-02

**Principal Product Type:** No Product

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:**

**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 07/08/2015

**Sanctions Ordered:** Monetary/Fine \$2,500.00

**Other Sanctions Ordered:**

**Sanction Details:** THE FULL FINE WAS LEVIED AGAINST THE FIRM AND IT WAS PAID IN FULL ON JULY 23, 2015.

#### Disclosure 2 of 4

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** JAG TRADING, A CBSX PERMIT HOLDER AND CRAIG BAUER AN ASSOCIATED PERSON OF JAG AND ITS MANAGING MEMBER, WERE EACH CENSURED AND JOINTLY AND SEVERALLY FINED \$10,000 FOR THE FOLLOWING CONDUCT. JAG TRADING ENTERED NUMEROUS BUY AND SELL ORDERS THAT TRADED AGAINST EACH OTHER, RESULTING IN 33 TRANSACTIONS WITH NO CHANGE IN BENEFICIAL OWNERSHIP AND THAT JAG TRADING AND BAUER FAILED TO HAVE ADEQUATE SUPERVISORY PROCEDURES IN PLACE TO DETECT AND PREVENT JAG TRADING'S TRANSACTIONS WITH NO CHANGE IN BENEFICIAL OWNERSHIP. (CBOE RULES 4.1 AND 4.2).

**Initiated By:** CHICAGO BOARD OPTIONS EXCHANGE

**Date Initiated:** 11/15/2011



**Docket/Case Number:** 11-0033

**Principal Product Type:** Options

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:**

**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 04/12/2012

**Sanctions Ordered:** Censure  
Monetary/Fine \$10,000.00

**Other Sanctions Ordered:** JAG TRADING, LLC AND CRAIG BAUER SHALL BE AND HEREBY ARE CENSURED AND JOINTLY AND SEVERALLY FINED IN THE AMOUNT OF TEN THOUSAND DOLLARS (\$10,000).

**Sanction Details:** JAG TRADING, LLC AND CRAIG BAUER SHALL BE AND HEREBY ARE CENSURED AND JOINTLY AND SEVERALLY FINED IN THE AMOUNT OF TEN THOUSAND DOLLARS (\$10,000).

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** IT IS ALLEGED THAT JAG TRADING ENTERED NUMEROUS BUY AND SELL ORDERS THAT TRADED AGAINST EACH OTHER, RESULTING IN THIRTY-THREE (33) TRANSACTIONS WITH NO CHANGE IN BENEFICIAL OWNERSHIP. IN ADDITION, JAG TRADING AND BAUER FAILED TO HAVE ADEQUATE SUPERVISORY PROCEDURES IN PLACE TO DETECT AND PREVENT JAG TRADING'S TRANSACTIONS WITH NO CHANGE IN BENEFICIAL OWNERSHIP. (VIOLATIONS OF EXCHANGE RULES 4.1 - JUST AND EQUITABLE PRINCIPLES OF TRADE AND 4.2 - ADHERENCE TO LAW)

**Initiated By:** CBOE

**Date Initiated:** 11/15/2011

**Docket/Case Number:** 11-0033

**Principal Product Type:** Options

**Other Product Type(s):**



**Principal Sanction(s)/Relief Sought:**

**Other Sanction(s)/Relief Sought:**

**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 04/12/2012

**Sanctions Ordered:** Censure  
Monetary/Fine \$10,000.00

**Other Sanctions Ordered:** JAG TRADING, LLC AND CRAIG BAUER SHALL BE AND HEREBY ARE CENSURED AND JOINTLY AND SEVERALLY FINED IN THE AMOUNT OF TEN THOUSAND DOLLARS (\$10,000).

**Sanction Details:** JAG TRADING, LLC AND CRAIG BAUER SHALL BE AND HEREBY ARE CENSURED AND JOINTLY AND SEVERALLY FINED IN THE AMOUNT OF TEN THOUSAND DOLLARS (\$10,000).

#### Disclosure 3 of 4

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** SEC RULE 15C3-1 OF EXCHANGE ACT, CHX ARTICLE 11 RULE 2 (MAINTENANCE OF BOOKS AND RECORDS), AND SEC RULE 17A-3(A)(13).

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 03/07/2011

**Docket/Case Number:** CHX-D-2011-04

**Principal Product Type:** Equity Listed (Common & Preferred Stock)

**Other Product Type(s):** EQUITY OTC

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/19/2011



**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Sanctions Ordered:** Monetary/Fine \$5,000.00

**Other Sanctions Ordered:**

**Sanction Details:** FINE WAS PAID IN FULL.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** ALLEGED VIOLATION OF SEC RULE 15C3-1 OF EXCHANGE ACT, CHX ARTICLE 11 RULE 2 (MAINTENANCE OF BOOKS AND RECORDS), AND SEC RUL 17A-3(A)(13).

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 03/07/2011

**Docket/Case Number:** CHX-D-2011-04

**Principal Product Type:** Equity Listed (Common & Preferred Stock)

**Other Product Type(s):** EQUITY OTC

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/19/2011

**Sanctions Ordered:** Monetary/Fine \$5,000.00

**Other Sanctions Ordered:** FINE OF \$5,000.00 PAID IN FULL

**Sanction Details:** FINE OF \$5,000.00 PAID IN FULL

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#### Disclosure 4 of 4

**Reporting Source:** Regulator



<b>Current Status:</b>	Final
<b>Allegations:</b>	SEE SUMMARY
<b>Initiated By:</b>	CHICAGO BOARD OPTIONS EXCHANGE
<b>Date Initiated:</b>	09/14/2005
<b>Docket/Case Number:</b>	05-0044
<b>Principal Product Type:</b>	Options
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Decision & Order of Offer of Settlement
<b>Resolution Date:</b>	11/16/2005
<b>Sanctions Ordered:</b>	Censure Monetary/Fine \$7,500.00
<b>Other Sanctions Ordered:</b>	JAG TRADING, L.L.C. SHALL BE AND HEREBY IS CENSURED AND FINED IN THE AMOUNT OF SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$7,500). IN ADDITION, AN UNDERTAKING WHEREBY JAG TRADING, LLC SHALL COMPUTE ITS NET CAPITAL EACH DAY FOR 45 CONSECUTIVE BUSINESS DAYS UPON ISSUANCE OF THE DECISION, AND SUBMIT ITS CAPITAL COMPUTATION TO THE EXCHANGE'S MEMBER FIRM REGULATION DEPARTMENT NO LATER THAN 8:00 AM (CENTRAL TIME).
<b>Sanction Details:</b>	JAG TRADING, L.L.C. SHALL BE AND HEREBY IS CENSURED AND FINED IN THE AMOUNT OF SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$7,500). IN ADDITION, AN UNDERTAKING WHEREBY JAG TRADING, LLC SHALL COMPUTE ITS NET CAPITAL EACH DAY FOR 45 CONSECUTIVE BUSINESS DAYS UPON ISSUANCE OF THE DECISION, AND SUBMIT ITS CAPITAL COMPUTATION TO THE EXCHANGE'S MEMBER FIRM REGULATION DEPARTMENT NO LATER THAN 8:00 AM (CENTRAL TIME).
<b>Regulator Statement</b>	JAG TRADING, LLC ("JAG"), AN EXCHANGE MARKET-MAKER ORGANIZATION, WAS CENSURED, FINED \$7,500, AND ORDERED TO CONDUCT AN UNDERTAKING WHEREBY JAG SHALL COMPUTE ITS NET CAPITAL EACH DAY FOR 45 CONSECUTIVE BUSINESS DAYS UPON ISSUANCE OF THE DECISION, AND SUBMIT ITS CAPITAL COMPUTATION TO THE EXCHANGE'S MEMBER FIRM REGULATION DEPARTMENT NO LATER THAN 8:00 AM (CENTRAL TIME). ON OR ABOUT MARCH 21, 2005 THROUGH ON OR ABOUT MARCH 22, 2005, JAG OPERATED WITH NET CAPITAL BELOW



THE MINIMUM REQUIRED AMOUNT OF \$100,000. (CBOE RULES 4.2 ADHERENCE TO LAW; 13.1 MINIMUM REQUIREMENTS; 15.1 FURNISHING OF BOOKS, RECORDS AND OTHER INFORMATION; AND SECTION 15(C) OF THE SECURITIES EXCHANGE ACT OF 1934, AS AMENDED (THE "ACT") AND RULE 15C3-1 - NET CAPITAL THEREUNDER)

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** ALLEGED VIOLATION OF EXCHANGE RULES 4.2; 13.1; 15.1; SECTION 15(C) OF THE ACT AND RULE 15C3-1 THEREUNDER IN THAT FIRM OPERATED WITH NET CAPITAL BELOW THE MINIMUM REQUIRED AMOUNT OF \$100,000.

**Initiated By:** CHICAGO BOARD OPTIONS EXCHANGE

**Date Initiated:** 09/14/2005

**Docket/Case Number:** 05-0044

**Principal Product Type:** Options

**Other Product Type(s):**

**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

**Other Sanction(s)/Relief Sought:** CENSURE

**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 11/18/2005

**Sanctions Ordered:** Censure  
Monetary/Fine \$7,500.00

**Other Sanctions Ordered:** FIRM SHALL COMPUTE ITS NET CAPITAL DAILY FOR 45 DAYS AND SUBMIT TO EXCHANGE'S MEMBER FIRM REGULATION NO LATER THAN 8 AM.

**Sanction Details:** FIRM SHALL COMPUTE ITS NET CAPITAL DAILY FOR 45 DAYS AND SUBMIT TO EXCHANGE'S MEMBER FIRM REGULATION NO LATER THAN 8 AM.

**End of Report**



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