BrokerCheck Report

WALLEYE TRADING LLC

CRD# 136196

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

For additional information about the contents of this report, please refer to the User Guidance or 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.

WALLEYE TRADING LLC

CRD# 136196

SEC# 8-66988

Main Office Location

401 LAKE STREET EAST
3RD FLOOR
WAYZATA, MN 55391
Regulated by FINRA Kansas City Office

Mailing Address

401 LAKE STREET EAST
3RD FLOOR
WAYZATA, MN 55391

Business Telephone Number

952-345-5200

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 04/25/2005.

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
- 13 Self-Regulatory Organizations
- 0 U.S. states and territories

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

This firm conducts 2 types of businesses.

This firm is affiliated with 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	14

Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 04/25/2005.

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.

WALLEYE TRADING LLC

Doing business as WALLEYE TRADING LLC

CRD# 136196

SEC# 8-66988

Main Office Location

401 LAKE STREET EAST
3RD FLOOR
WAYZATA, MN 55391

Regulated by FINRA Kansas City Office

Mailing Address

401 LAKE STREET EAST
3RD FLOOR
WAYZATA, MN 55391

Business Telephone Number

952-345-5200

Firm Profile

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

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	WALLEYE INVESTMENTS FUND LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	04/2006
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	ENGLAND, WILLIAM DUNNING 6210716
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF EXECUTIVE OFFICER
Position Start Date	07/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	ESSAFI, KHALID 7148450
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF COMPLIANCE OFFICER
Position Start Date	01/2024

Direct Owners and Executive Officers (continued)

Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	GIANPETRO, SARAH ANN
	6476299
Is this a domestic or foreign entity or an individual?	Individual
Position	CO-HEAD FINANCE AND ACCOUNTING & FINOP
Position Start Date	03/2024
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	FISH FACTORY LP
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FISH HOUSE LP
Relationship to Direct Owner	SOLE LIMITED PARTNER
Relationship Established	12/2023
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FISH HOUSE LP
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	WALLEYE CAPITAL LLC
Relationship to Direct Owner	SOLE MEMBER
Relationship Established	12/2023
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	WALLEYE OPPORTUNITIES MASTER FUND LTD
Is this a domestic or foreign entity or an individual?	Foreign Entity

Firm Profile

Indirect Owners (continued)

Company through which indirect ownership is established	WALLEYE INVESTMENTS FUND
Relationship to Direct Owner	MEMBER
Relationship Established	01/2024
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	ENGLAND, WILLIAM DUNNING
	6210716
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	FISH FACTORY LP
Relationship to Direct Owner	MEMBER
Relationship Established	03/2024
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FISH FARM LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FISH FACTORY LP
Relationship to Direct Owner	GENERAL PARTNER

Firm Profile

Indirect Owners (continued)

Relationship Established	12/2023
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FISH FARM LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FISH HOUSE LP
Relationship to Direct Owner	GENERAL PARTNER
Relationship Established	12/2023
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	WALLEYE CAPITAL LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	WALLEYE OPPORTUNITIES MASTER FUND LTD
Relationship to Direct Owner	MANAGER
Relationship Established	04/2008
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes

Firm Profile

Indirect Owners (continued)

Is this a public reporting company?	No

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, 13 SROs and 0 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	08/25/2005

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	05/21/2024
BOX Exchange LLC	Approved	05/07/2012
Cboe BYX Exchange, Inc.	Approved	11/12/2010
Cboe BZX Exchange, Inc.	Approved	12/01/2008
Cboe C2 Exchange, Inc.	Approved	07/12/2021
Cboe EDGX Exchange, Inc.	Approved	04/17/2018
Cboe Exchange, Inc.	Approved	06/01/2006
Miami International Securities Exchange, LLC	Approved	05/13/2015
NYSE American LLC	Approved	06/01/2009
NYSE Arca, Inc.	Approved	03/02/2007
Nasdaq ISE, LLC	Approved	08/25/2005
Nasdaq PHLX LLC	Approved	08/25/2005
Nasdaq Stock Market	Approved	09/28/2009

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 2 types of businesses.

Types of Business

Put and call broker or dealer or option writer
Trading securities for own account

Other Types of Business

This firm does effect transactions in commodities, commodity futures, or commodity options.
This firm does not engage in other non-securities business.

Non-Securities Business Description:

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:	COMPLYSCI
Business Address:	136 MADISON AVE NEW YORK, NY 10016
Effective Date:	07/25/2014
Description:	PERSONAL TRADING CONFIRMATIONS AND EMPLOYEE CERTIFICATION.

Name:	AMAZON WEB SERVICES
Business Address:	40 TERRY AVE N. SEATTLE, WA 98109
Effective Date:	12/17/2013
Description:	AWS IS A CLOUD DATA PROVIDER THAT MAINTAINS CERTAIN BOOKS AND RECORDS.

Name:	SMARSH
Business Address:	921 SW WASHIGTON STREET, SUITE 540 PORTLAND, OR 97205
Effective Date:	12/06/2011
Description:	ELECTRONIC ARCHIVING SERVICES

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

Name:	GOLDMAN, SACHS & CO.
CRD #:	361
Business Address:	200 WEST STREET NEW YORK, NY 10282
Effective Date:	03/07/2016
Description:	GS&CO PROVIDES CLEARING SERVICES FOR THE FIRM

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, 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.

DOCKSIDE PLATFORMS is under common control with the firm.

CRD #:	330606
Business Address:	120 FIFTH AVENUE 11TH FLOOR NEW YORK, NY 10011
Effective Date:	11/02/2023
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WALLEYE TRADING LLC AND DOCKSIDE LLC ARE UNDER COMMON CONTROL OF WALLEYE CAPITAL LLC. DOCKSIDE IS A REGISTERED INVESTMENT ADVISER AND A WHOLLY OWNED SUBSIDIARY OF WALLEYE CAPITAL LLC

WALLEYE CAPITAL (DIFC) LIMITED is under common control with the firm.

Business Address:	THE GATE PRECINCT BUILDING 4, DIFC FLOOR 5, OFFICE 8 DUBAI, UAE
Effective Date:	02/28/2024
Foreign Entity:	Yes
Country:	UAE
Securities Activities:	Yes
Investment Advisory Activities:	Yes

Firm Operations

Organization Affiliates (continued)

Description:	WALLEYE TRADING LLC AND WALLEYE CAPITAL (DIFC) LIMITED ARE UNDER COMMON CONTROL OF WALLEYE CAPITAL LLC. WALLEYE CAPITAL (DIFC) LIMITED IS A RELYING ADVISOR OF WALLEYE CAPITAL LLC.

WALLEYE CAPITAL (UK) LIMITED is under common control with the firm.

Business Address:	MOSS HOUSE, FLOOR 2, 15-16 BROOKS MEWS LONDON, UNITED KINGDOM W1K 4DS
Effective Date:	10/24/2023
Foreign Entity:	Yes
Country:	UNITED KINGDOM
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WALLEYE TRADING LLC AND WALLEYE CAPITAL (UK) LIMITED ARE UNDER COMMON CONTROL OF WALLEYE CAPITAL LLC. WALLEYE CAPITAL (UK) LIMITED IS A RELYING ADVISOR OF WALLEYE CAPITAL LLC.

WALLEYE CAPITAL LLC controls the firm.

CRD #:	161413
Business Address:	401 LAKE STREET EAST 3RD FLOOR WAYZATA, MN 55391
Effective Date:	04/25/2005
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	Yes
Description:	WALLEYE CAPITAL LLC IS THE MANAGER OF WALLEYE TRADING LLC. WILLIAM ENGLAND (621076) IS THE CEO OF WALLEYE CAPITAL LLC.

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

- **bank holding company**
- **national bank**

Firm Operations

Organization Affiliates (continued)

- **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	14	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 14

Reporting Source:	Regulator
Current Status:	Final

Allegations:	DURING THE REVIEW PERIOD, THE FIRM, IN 9,008 AUCTIONS, INADVERTENTLY SUBMITTED MORE THAN ONE ORDER IN RESPONSE TO A PAN AT A PARTICULAR PRICE POINT THAT EXCEEDED, IN THE AGGREGATE, THE SIZE OF THE PIXL ORDER. AS A RESULT, THE FIRM ENTERED ORDERS FOR 36,898 MORE CONTRACTS THAN IT SHOULD HAVE, RESULTING IN 509 EXECUTIONS. THE VIOLATIONS OCCURRED DUE TO A CODING ERROR WITH THE FIRM'S TRADING SYSTEM THAT ALLOWED DIFFERENT TRADING STRATEGIES, WHILE OPERATING INDEPENDENTLY, TO SUBMIT MULTIPLE RESPONSES AT THE SAME PRICE. THE CONDUCT DESCRIBED IN THIS PARAGRAPH CONSTITUTES VIOLATIONS OF PHLX RULE 1087(B)(1)(K). DURING THE REVIEW PERIOD, THE FIRM DID NOT ESTABLISH, MAINTAIN AND ENFORCE ANY SYSTEM OF SUPERVISION TO DETECT AND PREVENT DIFFERENT TRADING STRATEGIES FROM SUBMITTING MULTIPLE PAN RESPONSES AT THE SAME PRICE THAT IN THE AGGREGATE EXCEEDED THE SIZE OF THE PIXL ORDER.
Initiated By:	NASDAQ PHLX LLC
Date Initiated:	11/27/2019
Docket/Case Number:	2019.11.0080
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	10/27/2020
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM CONSENTED TO THE IMPOSITION OF (1) A CENSURE; AND (2) A FINE IN THE AMOUNT OF $20,000 (COMPRISED OF $10,000 FOR THE VIOLATIONS OF PHLX RULE 1087(B)(1)(K) AND $10,000 FOR THE VIOLATIONS OF PHLX RULE 748(H)).

Reporting Source:	Firm
Current Status:	Final

Allegations:	THE FIRM, IN 9,008 INSTANCES, INADVERTENTLY SUBMITTED MORE THAN ONE ORDER IN RESPONSE TO A PAN AT A PARTICULAR PRICE POINT THAT EXCEEDED, IN THE AGGREGATE, THE SIZE OF THE PIXL ORDER.
Initiated By:	NASDAQ PHLX LLC
Date Initiated:	07/28/2020
Docket/Case Number:	2019.11.0080
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	10/27/2020
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	THE SANCTION RESULTED IN A FINE OF $20,000.
Firm Statement	ACTION STATUS IS FINAL.

Disclosure 2 of 14

Reporting Source:	Regulator
Current Status:	Final
Allegations:	WALLEYE TRADING LLC, ON NUMEROUS OCCASIONS, FAILED TO GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE. VIOLATIONS OF EXCHANGE RULE 6.45B. WALLEYE WAS CENSURED AND FINED $5,000.
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	04/06/2017
Docket/Case Number:	17-0033/ 20150467263
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:	10/19/2018
Sanctions Ordered:	Censure Monetary/Fine $5,000.00
Other Sanctions Ordered:	
Sanction Details:	A $5,000 FINE AND A CENSURE.

Reporting Source:	Firm
Current Status:	Final
Allegations:	FROM ON OR ABOUT JUNE 1, 2014 THROUGH ON OR ABOUT JUNE 30, 2016. THE FIRM, ON NUMEROUS OCCASIONS, FAILED TO GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE.
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	12/28/2016
Docket/Case Number:	STAR NO. 20150467263
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	10/19/2018
Sanctions Ordered:	Censure Monetary/Fine $5,000.00
Other Sanctions Ordered:	
Sanction Details:	$5000. CHECK WAS DELIVERED TO THE CBOE ON 10/29/2018.

Firm Statement	FIRM RESPONDED TO THE CBOE ON JANUARY 20, 2017

Disclosure 3 of 14

Reporting Source:	Regulator
Current Status:	Final
Allegations:	THE BUSINESS CONDUCT COMMITTEE ("COMMITTEE"), PURSUANT TO RULE 960.2(F) OF THE RULES OF NASDAQ PHLX LLC ("EXCHANGE RULES"), AND UPON INFORMATION AND BELIEF, HEREBY AUTHORIZES THE ISSUANCE OF THIS STATEMENT OF CHARGES AND ALLEGES THAT RESPONDENT'S FINANCIAL RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES DID NOT ADEQUATELY: (I) PROVIDE FOR THE DOCUMENTATION, AND ANALYSIS, TIME-STAMPING AND APPROVAL, OF ADJUSTMENTS IN ITS CAPITAL THRESHOLDS; (II) PROVIDE A FORMAL PROCESS FOR EVIDENCING THE FIRM'S SUPERVISORY REVIEW FOR WASH SALES AND MARKING-THE-CLOSE ACTIVITY; AND (III) IDENTIFY THE INDIVIDUAL RESPONSIBLE FOR CONDUCTING MARKET ACCESS-RELATED REVIEWS OR INCLUDE A STATEMENT AS TO HOW SUCH REVIEWS WERE DOCUMENTED. THE FINDINGS STATED THAT THE FIRM DID NOT RETAIN, AND ITS FINANCIAL RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES DID NOT PROVIDE FOR RETENTION OF, RECORDS EVIDENCING ANY BREACHES OF THE FIRM'S HARD LIMIT CAPITAL CONTROLS.
Initiated By:	NASDAQ PHLX LLC
Date Initiated:	12/16/2016
Docket/Case Number:	2014039911501
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:	12/19/2016

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:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM IS CENSURED AND FINED $20,000. IF RESPONDENT FAILS TO PAY THE FINE WITHIN 30 CALENDAR DAYS OF THE DATE OF THIS DECISION, OR FAILS TO COMPLY WITH ANY OTHER SANCTION BY THE DATE SET FORTH HEREIN, THE COMMITTEE SHALL DECLARE RESPONDENT TO BE IN MATERIAL BREACH OF ITS AGREEMENT AND MAY TAKE WHATEVER ACTIONS IT DEEMS NECESSARY TO RESPOND TO THE BREACH, INCLUDING, BUT NOT LIMITED TO, RESCINDING THIS DECISION AND ALLOWING THE MATTER TO PROCEED IN ACCORDANCE WITH EXCHANGE RULES 960.1 THROUGH 960.12.
Regulator Statement	THE DECISION OF THE BUSINESS CONDUCT COMMITTEE ("COMMITTEE") OF NASDAQ PHLX LLC (THE "EXCHANGE") IN THE MATTER IS AS FOLLOWS: THE FIRM MADE AN OFFER OF SETTLEMENT, STIPULATION OF FACTS AND CONSENT TO SANCTIONS. RESPONDENT AGREES THAT THE DECISION TO BE ISSUED SHALL BE FINAL, AND WAIVES ANY RIGHT TO A REVIEW OF THE DECISION OR ANY OTHER PHASE OR ASPECT OF THIS PROCEEDING BY THE BOARD OF DIRECTORS OF THE EXCHANGE; BY THE U.S. SECURITIES AND EXCHANGE COMMISSION; BY ANY FEDERAL OR STATE COURT; OR IN ANY OTHER FORUM OR BY ANY OTHER MEANS. THE COMMITTEE ACCEPTS THE FOREGOING STIPULATION OF FACTS AND ON THE BASIS THEREOF FINDS THAT RESPONDENT VIOLATED RULES 17A-3(A)(6)(I) AND 17A-4(B) PROMULGATED UNDER THE EXCHANGE ACT, AND EXCHANGE RULES 748(H) AND 760. THE COMMITTEE BELIEVES THAT THE SANCTIONS PROPOSED BY RESPONDENT IN ITS OFFER SERVE THE PUBLIC INTEREST, ARE SUFFICIENTLY REMEDIAL UNDER THE CIRCUMSTANCES, AND REPRESENT A PROPER DISCHARGE OF THE EXCHANGE'S REGULATORY RESPONSIBILITIES UNDER THE EXCHANGE ACT OF 1934. (ASSOCIATED CASE PHLX ENFORCEMENT # 2016-18, FINRA NO. 20140399115)

Reporting Source:	Firm
Current Status:	Final
Allegations:	FINANCIAL RISK MANANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES - DID NOT ADEQUATELY PROVIDE FOR A FORMAL PROCESS TO DOCUMENT ADJUSTMENTS TO CAPITAL THRESHOLDS. - DID NOT PROVIDE FOR RETENTION OF RECORDS EVIDENCING BREACHES OF HARD ORDER LIMIT - DID NOT INCLUDE A FORMAL PROCESS EVIDENCING REVIEW OF WASH SALE AND MARK THE CLOSE, IDENTIFIED THE INDIVIDUAL RESPONSIBLE FOR CONDUCTING MARKET ACCESS RELATED REVIEWS OR INCLUDE A STATEMENT AS TO HOW SUCH REVIEWS WERE TO BE DOCUMENTED.
Initiated By:	NASDAQ PHLX LLC
Date Initiated:	12/01/2016
Docket/Case Number:	20140399115
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	$20,000 FINE
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	12/16/2016
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	CENSURE AND $20,000 FINE PAID BY CHECK.
Firm Statement	ACTION STATUS IS FINAL

Disclosure 4 of 14

Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT BECAUSE OF A

MISTAKE MADE IN A CODING CHANGE TO THE FIRM'S TRADING SYSTEM IT UNINTENTIONALLY ENABLED ITS TRADING SYSTEM TO SEND INTERMARKET SWEEP ORDERS (ISOS) TO BATS BZX EXCHANGE, INC. THE FINDINGS STATED THAT DUE TO THE CODING ERROR THE FIRM FAILED TO REASONABLY AVOID DISPLAYING, AND ENGAGED IN A PATTERN OR PRACTICE OF DISPLAYING, QUOTATIONS THAT LOCKED OR CROSSED A PROTECTED QUOTATION ON BZX. IN LIGHT OF THE FIRM'S UNKNOWINGLY AND UNINTENTIONALLY SUBMITTING ISOS TO BZX IT FAILED TO ESTABLISH, DOCUMENT, IMPLEMENT, AND MAINTAIN A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES, INCLUDING WSPS AND A SYSTEM OF FOLLOW-UP AND REVIEW, REASONABLY DESIGNED TO MANAGE CERTAIN RISKS OF PROVIDING MARKET ACCESS INCLUDING, BUT NOT LIMITED TO, CONTROLS TO PREVENT THE ENTRY OF ORDERS UNLESS THERE HAS BEEN COMPLIANCE WITH ALL REGULATORY REQUIREMENTS THAT MUST BE SATISFIED ON A PRE-ORDER ENTRY BASIS AND TO ENSURE COMPLIANCE WITH BZX RULE 11.20. THIS CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF RULE 15C3-5(C)(2)(I) OF THE SECURITIES EXCHANGE ACT OF 1934, AND BZX RULES 3.1, 5.1, 5.2, AND 5.3.

Initiated By:	BATS BZX EXCHANGE, INC.
Date Initiated:	05/31/2016
Docket/Case Number:	2014042053201
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/31/2016
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:	Censure Monetary/Fine $7,500.00
Other Sanctions Ordered:	

Sanction Details:	THE FIRM WAS CENSURED AND FINED $7,500.

Reporting Source:	Firm
Current Status:	Final
Allegations:	BECAUSE OF A MISTAKE MADE IN A CODING CHANGE TO THE FIRM'S TRADING SYSTEM ON OR AROUND JULY 19, 2011, WEYE UNINTENTIONALLY ENABLED ITS TRADING SYSTEM TO SEND INTERMARKET SWEEP ORDERS ("ISOS") TO BZX. AS A RESULT, DURING THE REVIEW PERIOD THE FIRM UNKNOWINGLY SUBMITTED 14,967 ISOS TO BZX. DUE TO THE CODING ERROR REFERENCED ABOVE, DURING THE REVIEW PERIOD THE FIRM FAILED, IN 13 INSTANCES, TO REASONABLY AVOID DISPLAYING, AND ENGAGED IN A PATTERN OR PRACTICE OF DISPLAYING, QUOTATIONS THAT LOCKED OR CROSSED A PROTECTED QUOTATION ON BZX.
Initiated By:	BATS BZX EXCHANGE
Date Initiated:	04/14/2016
Docket/Case Number:	20140420532-01
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	$7500 FINE
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	05/31/2016
Sanctions Ordered:	Censure Monetary/Fine $7,500.00
Other Sanctions Ordered:	NONE
Sanction Details:	$7500 FINE
Firm Statement	ACTION STATUS IS FINAL

Disclosure 5 of 14

Reporting Source:	Regulator

Current Status:	Final
Allegations:	DURING THE REVIEW PERIOD, WITH RESPECT TO 1042 ORDERS THAT WALLEYE HAD ENTERED ON THE ISE FOR A TOTAL OF 256,649 CONTRACTS, WALLEYE MISMARKED THE CLIENT CATEGORY AS "ISE MM" WHEN THESE ORDERS WERE BOOKED INTO THE FIRM'S SUB-ACCOUNT FOR ANOTHER MARKET AND THEREFORE SHOULD HAVE BEEN MARKED AS "FARMM". THIS CONSTITUTES A VIOLATION OF ISE RULE 712(A).
Initiated By:	INTERNATIONAL SECURITIES EXCHANGE
Date Initiated:	11/21/2015
Docket/Case Number:	2014-149
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	12/22/2015
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:	Censure Monetary/Fine $12,000.00
Other Sanctions Ordered:	
Sanction Details:	FIRM FINED $12,000

Reporting Source:	Firm
Current Status:	Final
Allegations:	WALLEYE MISMARKED THE CLIENT CATEGORY AS "ISE MM" WHEN THOSE ORDERS WERE BOOKED INTO THE FIRM'S SUB-ACCOUNT FOR ANOTHER MARKET AND THEREFORE SHOULD HAVE BEEN MARKED "FARMM"

Initiated By:	INTERNATIONAL SECURITIES EXCHANGE
Date Initiated:	10/28/2015
Docket/Case Number:	2014-149
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	$12,000 FINE
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/05/2016
Sanctions Ordered:	Censure Monetary/Fine $12,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	$12,000 FINE TO BE DEDUCTED BY ISE FROM THE FIRM'S OCC ACCOUNT.
Firm Statement	ACTION STATUS IS FINAL

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING ANY ALLEGATIONS OR FINDINGS, THE HEARING OFFICER ACCEPTED THE OFFER OF SETTLEMENT AND CONSENT AND ISSUED A DECISION. A FINRA HEARING OFFICER CONSIDERED AN OFFER OF SETTLEMENT AND CONSENT ENTERED INTO BETWEEN FINRA ON BEHALF OF NYSE REGULATION, INC. AND THE FIRM. THE FIRM VIOLATED NYSE ARCA OPTIONS RULES 6.68(A), 6.69(A), AND 11.16(A), AND SECURITIES AND EXCHANGE ACT RULE 17A-3(A) BY USING THE WRONG ORIGIN CODE ON 551,529 OPTIONS ORDERS BETWEEN AUGUST 2011 AND MARCH 2012; VIOLATED NYSE AREA OPTIONS RULE 6. 95(A) BY FAILING TO REASONABLY AVOID DISPLAYING, AND ENGAGING IN A PATTERN AND/OR PRACTICE OF DISPLAYING, QUOTATIONS THAT LOCKED AND/OR CROSSED THE NATIONAL BEST BID OR OFFER WITHOUT TAKING CORRECTIVE ACTION IN A TIMELY MANNER, IN 20,263 INSTANCES, BETWEEN APRIL AND JUNE 2013; AND VIOLATED NYSE ARCA OPTIONS RULE 11.18 DURING THE ABOVE-REFERENCED PERIODS BY FAILING TO HAVE ADEQUATE SUPERVISORY PROCEDURES AND/OR A SYSTEM OF

	FOLLOW-UP AND REVIEW, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ENSURE THAT THE FIRM MARKED ITS OPTIONS ORDERS WITH THE CORRECT ORIGIN CODE, AND DETECTED AND PREVENTED QUOTES THAT LOCKED AND/OR CROSSED THE NATIONAL BEST BID OR OFFER.
Initiated By:	NYSE ARCA, INC.
Date Initiated:	06/16/2015
Docket/Case Number:	2012032897501
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	06/16/2015
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:	Censure Monetary/Fine $75,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM IS CENSURED AND FINED $75,000. THE FINE MUST BE PAID WITHIN 30 DAYS OF THE DATE OF THIS DECISION OR THE FIRM MAY FACE SUSPENSION, PURSUANT TO THE TERMS OF THE DECISION AND NYSE ARCA OPTIONS RULE 13.2(A).
Regulator Statement	THIS MATTER IS RELATED TO PROCEEDING NUMBER 20130380427.

Reporting Source:	Firm
Current Status:	Final
Allegations:	WALLEYE USED THE WRONG ORIGIN CODE ON 551,529 OPTIONS ORDERS BETWEEN AUGUST 2011 AND MARCH 2012.

	WALLEYE FAILED TO REASONABLY AVOID DISPLAYING, AND ENGAGING IN A PATTERN AND/OR PRACTICE OF DISPLAYING, QUOTATIONS THAT LOCKED AND/OR CROSSED THE NATIONAL BEST BID OR OFFER WITHOUT TAKING CORRECTIVE ACTION IN A TIMELY MANNER, IN 20,263 INSTANCES, BETWEEN APRIL AND JUNE 2013. WALLEYE FAILED TO HAVE ADEQUATE SUPERVISORY PROCEDURES AND/OR SYSTEM OF FOLLOW UP AND REVIEW.
Initiated By:	NYSE ARCA
Date Initiated:	01/05/2015
Docket/Case Number:	20120328975
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE: $75,000
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	06/16/2015
Sanctions Ordered:	Censure Monetary/Fine $75,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	$75000 FINE PAID ON 6/19/2015.
Firm Statement	ACTION STATUS IS FINAL.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WALLEYE TRADING, LLC ("WALLEYE"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED $10,000 FOR THE FOLLOWING CONDUCT. WALLEYE, ON NUMEROUS OCCASIONS, FAILED TO GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE. IN ACCEPTING THIS LETTER OF CONSENT, THE BUSINESS CONDUCT COMMITTEE CONSIDERED AMONG OTHER THINGS, THE TOTAL NUMBER OF EXCEPTIONS INVOLVED IN THE CONDUCT DESCRIBED ABOVE. (EXCHANGE RULE 6.45B - PRIORITY AND ALLOCATION

	OF TRADES IN INDEX OPTIONS AND OPTIONS ON ETFS ON THE CBOE HYBRID SYSTEM)
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	11/20/2014
Docket/Case Number:	14-0076
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:	Consent
Resolution Date:	12/15/2014
Sanctions Ordered:	Censure Monetary/Fine $10,000.00
Other Sanctions Ordered:	
Sanction Details:	A $10,000 FINE AND A CENSURE.

Reporting Source:	Firm
Current Status:	Final
Allegations:	FROM IN OR ABOUT JANUARY 2009 THROUGH ABOUT MAY 2013, WALLEYE, ON NUMEROUS OCCASIONS, DID NOT GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE.
Initiated By:	CBOE
Date Initiated:	04/22/2014
Docket/Case Number:	14-0076
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	$10000 FINE

Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	11/20/2014
Sanctions Ordered:	Censure Monetary/Fine $10,000.00
Other Sanctions Ordered:	
Sanction Details:	$10000 FINE
Firm Statement	$10000 FINE

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WALLEYE TRADING, LLC ("WALLEYE"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED $20,000 FOR THE FOLLOWING CONDUCT. WALLEYE RESPONDED TO A TOTAL OF 4,228 AIM AUCTIONS, RECEIVING EXECUTIONS ON 26,558 CONTRACTS IN OPTIONS CLASSES IN WHICH WALLEYE DID NOT HOLD AN APPOINTMENT. (EXCHANGE RULE 6.74A - AUTOMATED IMPROVEMENT MECHANISM ("AIM"))
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	09/09/2014
Docket/Case Number:	14-0078
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:	Consent
Resolution Date:	10/06/2014
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	
Sanction Details:	A $20,000 FINE AND A CENSURE.

Reporting Source:	Firm
Current Status:	Final
Allegations:	DURING THE APPROXIMATE PERIOD FROM IN OR ABOUT NOVEMBER 2012 THROUGH IN OR ABOUT DECEMBER 2012, WALLEYE RESPONDED TO A TOTAL OF 4,228 AIM AUCTIONS, RECEIVING EXECUTIONS ON 26,558 CONTRACTS, IN OPTIONS CLASSES IN WHICH WALLEYE DID NOT HOLD AN APPOINTMENT.
Initiated By:	CBOE
Date Initiated:	07/07/2014
Docket/Case Number:	14-0078
Principal Product Type:	Options
Other Product Type(s):	NONE
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	$20,000 FINE.
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	10/06/2014
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	
Sanction Details:	DURING THE APPROXIMATE PERIOD FROM IN OR ABOUT NOVEMBER 2012 THROUGH IN OR ABOUT DECEMBER 2012, WALLEYE RESPONDED TO A TOTAL OF 4,228 AIM AUCTIONS, RECEIVING EXECUTIONS ON 26,558 CONTRACTS, IN OPTIONS CLASSES IN WHICH WALLEYE DID NOT HOLD AN APPOINTMENT.
Firm Statement	DURING THE APPROXIMATE PERIOD FROM IN OR ABOUT NOVEMBER 2012 THROUGH IN OR ABOUT DECEMBER 2012, WALLEYE RESPONDED TO A TOTAL OF 4,228 AIM AUCTIONS, RECEIVING EXECUTIONS ON 26,558 CONTRACTS, IN OPTIONS CLASSES IN WHICH WALLEYE DID NOT HOLD AN APPOINTMENT.

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Reporting Source:	Regulator

Current Status:	Final
Allegations:	WALLEYE TRADING, LLC ("WALLEYE"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED $15,000 FOR THE FOLLOWING CONDUCT. WALLEYE (I) FAILED TO REGISTER ITS CHIEF COMPLIANCE OFFICER AS A PROPRIETARY TRADER COMPLIANCE OFFICER (CT) WITH THE EXCHANGE IN WEBCRD; (II) FAILED TO REGISTER ITS FINANCIAL AND OPERATIONS PRINCIPAL AS A FINANCIAL AND OPERATIONS PRINCIPAL (FN) WITH THE EXCHANGE IN WEBCRD; AND (III) FAILED TO REGISTER FOUR (4) ASSOCIATED PERSONS AS A PROPRIETARY TRADER (PT) WITH THE EXCHANGE IN WEBCRD. (EXCHANGE RULE 3.6A - QUALIFICATION AND REGISTRATION OF TRADING PERMIT HOLDERS AND ASSOCIATED PERSONS)
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	07/22/2014
Docket/Case Number:	14-0045
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:	Consent
Resolution Date:	09/08/2014
Sanctions Ordered:	Censure Monetary/Fine $15,000.00
Other Sanctions Ordered:	
Sanction Details:	A $15,000 FINE AND A CENSURE.

Reporting Source:	Firm
Current Status:	Final
Allegations:	WALLEYE FAILED TO REGISTER -FOUR (4) ASSOCIATED PERSONS AS A PROPRIETARY TRADER (PT) WITH THE EXCHANGE IN WEBCRD. -ITS CHIEF COMPLIANCE OFFICER AS (CT) WITH THE EXCHANGE IN WEBCRD.

	-ITS FINANCIAL AND OPERATIONS PRINCIPAL AS (FN) WITH THE EXCHANGE IN WEBCRD.
Initiated By:	CBOE
Date Initiated:	07/10/2014
Docket/Case Number:	14-0045
Principal Product Type:	Options
Other Product Type(s):	NONE
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	$15,000 FINE.
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	09/08/2014
Sanctions Ordered:	Censure Monetary/Fine $15,000.00
Other Sanctions Ordered:	
Sanction Details:	WALLEYE FAILED TO REGISTER -FOUR (4) ASSOCIATED PERSONS AS A PROPRIETARY TRADER (PT) WITH THE EXCHANGE IN WEBCRD. -ITS CHIEF COMPLIANCE OFFICER AS (CT) WITH THE EXCHANGE IN WEBCRD. -ITS FINANCIAL AND OPERATIONS PRINCIPAL AS (FN) WITH THE EXCHANGE IN WEBCRD.
Firm Statement	WALLEYE FAILED TO REGISTER -FOUR (4) ASSOCIATED PERSONS AS A PROPRIETARY TRADER (PT) WITH THE EXCHANGE IN WEBCRD. -ITS CHIEF COMPLIANCE OFFICER AS (CT) WITH THE EXCHANGE IN WEBCRD. -ITS FINANCIAL AND OPERATIONS PRINCIPAL AS (FN) WITH THE EXCHANGE IN WEBCRD.

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Reporting Source:	Firm
Current Status:	Final
Allegations:	THE FIRM ACTING AS A REMOTE STREAMING QUOTE TRADER INADVERTENTLY FAILED TO QUOTE CONTINUOUSLY, TWO SIDED MARKETS

	IN MULTIPLE OPTIONS, THEREBY RESULTING IN 2,022 INSTANCES WHERE THE RESPONDENT DID NOT ADEQUATELY QUOTE IN AT LEAST 60% OF THE SERIES.
Initiated By:	NASDAQ OMX PHLX
Date Initiated:	06/30/2014
Docket/Case Number:	2014-09
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	$10,000 FINE
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	07/23/2014
Sanctions Ordered:	Censure Monetary/Fine $10,000.00
Other Sanctions Ordered:	NONE.
Sanction Details:	THE FIRM ACTING AS A REMOTE STREAMING QUOTE TRADER INADVERTENTLY FAILED TO QUOTE CONTINUOUSLY, TWO SIDED MARKETS IN MULTIPLE OPTIONS, THEREBY RESULTING IN 2,022 INSTANCES WHERE THE RESPONDENT DID NOT ADEQUATELY QUOTE IN AT LEAST 60% OF THE SERIES.
Firm Statement	THE FIRM ACTING AS A REMOTE STREAMING QUOTE TRADER INADVERTENTLY FAILED TO QUOTE CONTINUOUSLY, TWO SIDED MARKETS IN MULTIPLE OPTIONS, THEREBY RESULTING IN 2,022 INSTANCES WHERE THE RESPONDENT DID NOT ADEQUATELY QUOTE IN AT LEAST 60% OF THE SERIES.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	NYSE ARCA EQUITIES RULE 7.33 - WALLEYE TRADING LLC FAILED TO POPULATE APPROXIMATELY 117,567,123 ORDERS WITH THE CORRECT CAPACITY CODE.
Initiated By:	NYSE ARCA, INC.

Date Initiated:	04/04/2013
Docket/Case Number:	20120327754
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	04/04/2013
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:	Censure Monetary/Fine $15,000.00
Other Sanctions Ordered:	
Sanction Details:	WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, THE FIRM CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE THE FIRM IS CENSURED AND FINED $15,000, WHICH SANCTIONS TAKE EFFECT IMMEDIATELY. NYSE ARCA TOOK INTO CONSIDERATION THAT NO MARKET IMPACT OR HARM TO OTHER MARKET PARTICIPANTS OR CUSTOMERS RESULTED FROM THE FIRM'S VIOLATIONS, AND THAT PROMPTLY UPON NOTICE FROM FINRA THAT IT HAD NOT PROPERLY CODED ITS NYSE ARCA EQUITIES PROPRIETARY ORDERS, THE FIRM ENHANCED ITS SYSTEMS AND SUPERVISORY PROCEDURES TO ENSURE CORRECT MARKING OF ITS PROPRIETARY ORDERS SENT TO THE NYSE ARCA MARKETPLACE.
Regulator Statement	OTHER CASE NUMBER: 13-ARCA-5

Reporting Source:	Firm
Current Status:	Final
Allegations:	WALLEYE FAILED TO POPULATE APPROXIMATELY 117567124 PROPRIETARY ORDERS WITH THE CORRECT CAPACITY CODE.

Initiated By:	NYSE ARCA
Date Initiated:	03/14/2013
Docket/Case Number:	20120327754
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	04/04/2013
Sanctions Ordered:	Censure Monetary/Fine $15,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	WALLEYE FAILED TO POPULATE PROPRIETARY ORDERS WITH THE CORRECT CAPACITY CODE.
Firm Statement	WALLEYE FAILED TO POPULATE PROPRIETARY ORDERS WITH THE CORRECT CAPACITY CODE.

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	WALLEYE TRADING: (I) FAILED TO MAINTAIN AND ENHANCE COMPETITION AMONG MARKET-MAKERS IN SPXPM; (II) FAILED TO (A) COMPETE WITH OTHER MARKET-MAKERS IN SPXPM; (B) UPDATE ITS QUOTATIONS IN RESPONSE TO CHANGED MARKET CONDITIONS IN SPXPM; AND (C) MAINTAIN ACTIVE MARKETS IN SPXPM; AND (III) FAILED TO IMPLEMENT ADEQUATE SUPERVISORY PROCEDURES TO ENSURE COMPLIANCE WITH EXCHANGE RULES 8.2 AND 8.5. (VIOLATION OF EXCHANGE RULES 4.2, 8.2 AND 8.5)
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	11/16/2012
Docket/Case Number:	C2 12-0001

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:	03/18/2013
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	
Sanction Details:	A $20,000 FINE AND A CENSURE.

Reporting Source:	Firm
Current Status:	Final
Allegations:	IT IS ALLEGED THAT WALLEYE TRADING: - FAILED TO MAINTAIN AND ENHANCE COMPETITION AMONG MARKET MAKERS IN SPXPM - FAILED TO (I) COMPETE WITH OTHER MARKET MAKERS IN SPXPM; (II) UPDATE ITS QUOTATIONS IN RESPONSE TO CHANGED MARKET CONDITIONS IN SPXPM, (III) MAINTAIN ACTIVE MARKETS IN SPXPM. - FAILED TO IMPLEMENT ADEQUATE SUPERVISORY PROCEDURES TO ENSURE COMPLIANCE WITH EXCHANGE RULES 8.2 AND 8.5
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	11/16/2012
Docket/Case Number:	C2 12-0001
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:	03/18/2013
Sanctions Ordered:	Censure Monetary/Fine $20,000.00
Other Sanctions Ordered:	
Sanction Details:	A $20,000 FINE AND A CENSURE

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	ON 133 OCCASIONS DURING THE FIRST QUARTER OF 2008, AND 132 OCCASIONS DURING THE SECOND QUARTER OF 2008, WALLEYE RECEIVED A NON-MARKETABLE DIRECTED ORDER AND WITHIN 3 SECONDS OF THESE ORDERS BEING RELEASED INTO THE ISE TRADING SYSTEM, WALLEYE ENTERED A PROPRITARY ORDER THAT EXECUTED AGAINST THE DIRECTED ORDER.
Initiated By:	INTERNATIONAL SECURITIES EXCHANGE
Date Initiated:	08/28/2008
Docket/Case Number:	2008-071; 2008-118
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/09/2008
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 $7,500.00
Other Sanctions Ordered:	

Sanction Details:	FIRM FINED $7500

Reporting Source:	Firm
Current Status:	Final
Allegations:	ON 133 OCCASIONS DURING THE FIRST QUARTER OF 2008 AND 132 OCCASIONS DURING THE SECOND QUARTER OF 2008, WALLEYE RECEIVED A NON MARKETABLE DIRECTED ORDER AND WITHIN 3 SECONDS OF THESE ORDERS BEING RELEASED INTO THE ISE TRADING SYSTEM, WALLEYE ENTERED A PROPRIETARY ORDER THAT EXECUTED AGAINST THE DIRECTED ORDER.
Initiated By:	INTERNATIONAL SECURITIES EXCHANGE
Date Initiated:	08/28/2008
Docket/Case Number:	2008-071; 2008-118
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/09/2008
Sanctions Ordered:	Monetary/Fine $7,500.00
Other Sanctions Ordered:	
Sanction Details:	FIRM FINED $7500

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Reporting Source:	Regulator
Current Status:	Final
Allegations:	DURING THE PERIOD OF APRIL 2008 & JUNE 2009, WALLEYE IMPROVED ITS QUOTE IMMEDIATLY PRIOR TO THE ENTRY ONTO THE EXCHANGE OF ORDERS PREFERANCED TO IT TO RECIEVE AN ALLOCATION. THESE ACTIONS ARE IN VIOLATION OF ISE RULES 400 AND 713(SUPPLEMENTARY MATERIAL .03)

Initiated By:	INTERNATIONAL SECURITIES EXCHANGE, LLC
Date Initiated:	03/03/2010
Docket/Case Number:	2009-151
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/10/2010
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 $50,000.00
Other Sanctions Ordered:	
Sanction Details:	$50,000 FINE FOR VIOLATION OF ISE RULES 400 AND 713(SUPPLEMENTARY MATERIAL .03)

Reporting Source:	Firm
Current Status:	Final
Allegations:	WALLEYE IMPROVED ITS QUOTE IMMEDIATELY PRIOR TO THE ENTRY ONTO THE EXCHANGE OF ORDERS PREFERENCED TO IT TO RECEIVE AN ALLOCATION.
Initiated By:	INTERNATIONAL SECURITIES EXCHANGE, INC.
Date Initiated:	03/03/2010
Docket/Case Number:	2009-151
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:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	11/10/2010
Sanctions Ordered:	Monetary/Fine $50,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	THE SACTION RESULTED IN A FINE OF $50000 PAID ON DECEMBER 15, 2010
Firm Statement	THE ACTION IS FINAL

End of Report

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