

BrokerCheck Report

VISION FINANCIAL MARKETS LLC

CRD# 142271

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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



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.



VISION FINANCIAL MARKETS LLC

CRD# 142271

SEC# 8-67447

Main Office Location

1010 WASHINGTON BLVD
SUITE 300
STAMFORD, CT 06901
Regulated by FINRA Boston Office

Mailing Address

1010 WASHINGTON BLVD
SUITE 300
STAMFORD, CT 06901

Business Telephone Number

203-388-2700

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 05/15/2006.
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
- 15 Self-Regulatory Organizations
- 53 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? No

This firm conducts 11 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	30



Firm Profile

This firm is classified as a limited liability company.
This firm was formed in Delaware on 05/15/2006.
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.

VISION FINANCIAL MARKETS LLC
Doing business as VISION FINANCIAL MARKETS LLC
CRD# 142271
SEC# 8-67447

Main Office Location
1010 WASHINGTON BLVD
SUITE 300
STAMFORD, CT 06901

Regulated by FINRA Boston Office

Mailing Address
1010 WASHINGTON BLVD
SUITE 300
STAMFORD, CT 06901

Business Telephone Number
203-388-2700

Other Names of this Firm

Name	Where is it used
HR TRADER	CT, DE, IL, NY



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):	ROTHMAN, HOWARD MARTIN 1098190
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT, CFO, CEO, FINOP, PRINCIPAL FINANCIAL OFFICER
Position Start Date	01/1998
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):	ROTHMAN, MICHAEL DAVID 6682487
Is this a domestic or foreign entity or an individual?	Individual
Position	GENERAL MANAGER
Position Start Date	01/2025
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	FELAG, JOHN CHRISTOPHER 1874602
Is this a domestic or foreign entity or an individual?	Individual
Position	CHIEF RISK OFFICER

Firm Profile



Direct Owners and Executive Officers (continued)

Position Start Date 06/2015

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): HERRITT, JOSHUA DAVID
6205459

Is this a domestic or foreign entity or an individual? Individual

Position VP ADMINISTRATION, MUNICIPAL BOND PRINCIPAL, AND ROSFP

Position Start Date 06/2015

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): KARAFA, JOHN MICHAEL
2927594

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF COMPLIANCE OFFICER, AMLCO, AND ROSFP

Position Start Date 08/2019

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



Direct Owners and Executive Officers (continued)

Legal Name & CRD# (if any):	MARTINEZ, ANA 5288054
Is this a domestic or foreign entity or an individual?	Individual
Position	VICE PRESIDENT OPERATIONS, PRINCIPAL OPERATIONS OFFICER
Position Start Date	08/2014
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

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, 15 SROs and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	12/11/2006

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

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	01/10/2008
BOX Exchange LLC	Approved	08/05/2021
Cboe BYX Exchange, Inc.	Approved	11/15/2010
Cboe BZX Exchange, Inc.	Approved	04/01/2009
Cboe EDGA Exchange, Inc.	Approved	07/13/2012
Cboe EDGX Exchange, Inc.	Approved	07/13/2012
Cboe Exchange, Inc.	Approved	12/11/2006
NYSE American LLC	Approved	05/17/2018
NYSE Arca, Inc.	Approved	08/08/2012
NYSE National, Inc.	Approved	10/22/2020
Nasdaq GEMX, LLC	Approved	07/31/2014
Nasdaq ISE, LLC	Approved	09/04/2007
Nasdaq PHLX LLC	Approved	07/02/2012
Nasdaq Stock Market	Approved	11/02/2020
New York Stock Exchange	Approved	06/05/2019



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	02/12/2008
Alaska	Approved	02/04/2008
Arizona	Approved	02/12/2008
Arkansas	Approved	01/28/2008
California	Approved	01/17/2008
Colorado	Approved	02/01/2008
Connecticut	Approved	04/24/2007
Delaware	Approved	02/04/2008
District of Columbia	Approved	01/16/2008
Florida	Approved	04/08/2008
Georgia	Approved	01/31/2008
Hawaii	Approved	01/25/2008
Idaho	Approved	01/14/2008
Illinois	Approved	01/14/2008
Indiana	Approved	02/13/2008
Iowa	Approved	01/22/2008
Kansas	Approved	03/13/2008
Kentucky	Approved	01/09/2008
Louisiana	Approved	01/11/2008
Maine	Approved	02/22/2008
Maryland	Approved	01/29/2008
Massachusetts	Approved	01/30/2008
Michigan	Approved	01/24/2008
Minnesota	Approved	01/12/2008
Mississippi	Approved	01/10/2008
Missouri	Approved	02/22/2008
Montana	Approved	01/23/2008
Nebraska	Approved	03/04/2008
Nevada	Approved	01/15/2008
New Hampshire	Approved	03/31/2008
New Jersey	Approved	02/14/2008
New Mexico	Approved	01/16/2008
New York	Approved	01/31/2008

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	01/15/2008
North Dakota	Approved	01/11/2008
Ohio	Approved	01/17/2008
Oklahoma	Approved	01/15/2008
Oregon	Approved	02/26/2008
Pennsylvania	Approved	01/24/2008
Puerto Rico	Approved	01/31/2008
Rhode Island	Approved	01/24/2008
South Carolina	Approved	01/15/2008
South Dakota	Approved	01/15/2008
Tennessee	Approved	04/18/2008
Texas	Approved	02/14/2008
Utah	Approved	01/02/2008
Vermont	Approved	04/21/2008
Virgin Islands	Approved	02/11/2008
Virginia	Approved	01/11/2008
Washington	Approved	01/10/2008
West Virginia	Approved	01/10/2008
Wisconsin	Approved	02/26/2008
Wyoming	Approved	01/11/2008



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 11 types of businesses.

Types of Business

Exchange member engaged in exchange commission business other than floor activities

Exchange member engaged in floor activities

Broker or dealer retailing corporate equity securities over-the-counter

Broker or dealer selling corporate debt securities

Mutual fund retailer

U S. government securities broker

Municipal securities dealer

Municipal securities broker

Put and call broker or dealer or option writer

Trading securities for own account

Private placements of securities

Firm Operations



Clearing Arrangements

This firm does 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:	BOX INC.
Business Address:	900 JEFFERSON AVE. REDWOOD, CA 94063
Effective Date:	04/20/2023
Description:	WORM AND NON-WORM DOCUMENT STORAGE
Name:	QUEST CE
Business Address:	10100 W INNOVATION DRIVE, SUITE 200 MILWAUKEE, WI 53226
Effective Date:	04/20/2023
Description:	ELECTRONIC SYSTEM USED FOR CONTINUING EDUCATION
Name:	KNOWBE4 INC.
Business Address:	33 N GARDEN AVE, SUITE 1200 CLEARWATER, FL 33755
Effective Date:	04/20/2023
Description:	ELECTRONIC SYSTEM USED FOR CONTINUING EDUCATION
Name:	OWNBACKUP INC.
Business Address:	940 SYLVAN AVENUE ENGLEWOOD, NJ 07632
Effective Date:	04/20/2023
Description:	CLOUD-BASED SALESFORCE BACKUP AND ARCHIVING
Name:	ADSS GLOBAL
Business Address:	740 SPRINGDALE DRIVE, SUITE 208 EXTON, PA 19341
Effective Date:	04/20/2023
Description:	RESELLER OF SAGE 300 SOFTWARE
Name:	MUNIBROKERS, LLC/MARKETAXESS HOLDINGS INC.
Business Address:	55 HUDSON YARDS, FLOOR 15 NEW YORK, NY 10001

Firm Operations



Industry Arrangements (continued)

Effective Date:	04/20/2023
Description:	MANAGEMENT OF MUNICIPAL TRADING BID-WANTED PROCESS AND COMPLIANCE REPORTING.
Name:	WEBCE
Business Address:	12222 MERIT DR., SUITE 500 DALLAS, TX 75251
Effective Date:	04/09/2019
Description:	ELECTRONIC SYSTEM USED FOR CONTINUING EDUCATION.
Name:	SALES FORCE
Business Address:	SALES FORCE TOWER 415 MISSION ST., 3RD FL. SAN FRANCISCO, CA 94105
Effective Date:	05/01/2019
Description:	SOFTWARE FOR CLIENT INFORMATION AND RECORDKEEPING.
Name:	SITEQUEST, INC
Business Address:	707 WEST 700 SOUTH SUITE 200 WOODS CROSS, UT 84087
Effective Date:	12/01/2017
Description:	WEB SURVEILLANCE (EAGLE EYE)
Name:	FIS FINANCIAL SYSTEMS LLC
Business Address:	3 VAN DEGRAFF DRIVE BURLINGTON, MA 01803
Effective Date:	07/01/2013
Description:	BACK OFFICE SERVICE PROVIDER. (FORMERLY KNOWN AS SUNGARD)
Name:	STATEMENT SOLUTIONS, LLC
Business Address:	3 UNIVERSITY PLAZA DRIVE SUITE 500 HACKENSACK, NJ 07601
Effective Date:	07/01/2006
Description:	PRODUCES CLIENT STATEMENTS AND CONFIRMATIONS.
Name:	MICROSOFT COPORATION

Firm Operations



Industry Arrangements (continued)

Business Address: ONE MICROSOFT WAY
REDMOND, WA 98052

Effective Date: 09/01/2015

Description: NON WORM DOCUMENT STORAGE (MICROSOFT 360)

Name: NETDOCUMENTS SOFTWARE, INC

Business Address: 625 SOUTH STATE STREET
OREM, UT 84058

Effective Date: 01/01/2011

Description: DOCUMENT STORAGE WORM (NET DOCUMENTS)

Name: COMPLIANCE SCIENCE, INC

Business Address: 1111 EAST PUTNAM AVE
SUITE 304
RIVERSIDE, CT 06878

Effective Date: 01/01/2015

Description: COMPLIANCE DOCUMENTS AND ASSOCIATED PERSONS' PERSONAL
TRADING/TRACKING SOFTWARE PLATFORM.

Name: GLOBAL RELAY COMMUNICATIONS INC.

Business Address: 286 MADISON AVE
7TH FLOOR
NEW YORK, NY 10022

Effective Date: 07/12/2013

Description: ELECTRONIC COMMUNICATIONS RETENTION VENDOR.

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

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.**

HIGH RIDGE HOLDING COMPANY LLC is under common control with the firm.

Business Address:	75 BROAD STREET SUITE 1910 NEW YORK, NY 10004
Effective Date:	08/25/2014
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	VISION BROKERAGE SERVICES LLC, VISION INVESTMENT ADVISORS LLC AND HIGH RIDGE FUTURES LLC ARE AFFILIATED COMPANIES UNDER COMMON OWNERSHIP AND CONTROL OF HOWARD ROTHMAN AND ROBERT BOSHACK. VISION FINANCIAL MARKETS LLC IS ALSO AN AFFILIATED COMPANY OWNED AND CONTROLLED SOLELY BY HOWARD ROTHMAN.

HIGH RIDGE FUTURES LLC is under common control with the firm.

Business Address:	75 BROAD STREET NEW YORK, NY 10004
Effective Date:	08/25/2014
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No

Firm Operations



Organization Affiliates (continued)

Description: VISION BROKERAGE SERVICES LLC, VISION INVESTMENT ADVISORS LLC AND HIGH RIDGE FUTURES LLC ARE AFFILIATED COMPANIES UNDER COMMON OWNERSHIP AND CONTROL OF HOWARD ROTHMAN AND ROBERT BOSHACK. VISION FINANCIAL MARKETS LLC IS ALSO AN AFFILIATED COMPANY OWNED AND CONTROLLED SOLELY BY HOWARD ROTHMAN.

VISION BROKERAGE SERVICES, LLC is under common control with the firm.

CRD #: 47927

Business Address: 1010 WASHINGTON BLVD
SUITE 300
STAMFORD, CT 06901

Effective Date: 06/22/1999

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: VISION BROKERAGE SERVICES LLC, VISION INVESTMENT ADVISORS LLC AND HIGH RIDGE FUTURES LLC ARE AFFILIATED COMPANIES UNDER COMMON OWNERSHIP AND CONTROL OF HOWARD ROTHMAN AND ROBERT BOSHACK. VISION FINANCIAL MARKETS LLC IS ALSO AN AFFILIATED COMPANY OWNED AND CONTROLLED SOLELY BY HOWARD ROTHMAN.

VISION INVESTMENT ADVISORS, LLC is under common control with the firm.

CRD #: 109621

Business Address: 1010 WASHINGTON BLVD
SUITE 300
STAMFORD, CT 06901

Effective Date: 09/22/2000

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Firm Operations



Organization Affiliates (continued)

Description: VISION BROKERAGE SERVICES LLC, VISION INVESTMENT ADVISORS LLC AND HIGH RIDGE FUTURES LLC ARE AFFILIATED COMPANIES UNDER COMMON OWNERSHIP AND CONTROL OF HOWARD ROTHMAN AND ROBERT BOSHACK. VISION FINANCIAL MARKETS LLC IS ALSO AN AFFILIATED COMPANY OWNED AND CONTROLLED SOLELY BY HOWARD ROTHMAN.

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	30	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 30

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 IT TENDERED MORE SHARES THAN IT WAS ENTITLED TO TENDER IN A COMPANY PARTIAL TENDER OFFER (PTO). THE FINDINGS STATED THAT ON AUGUST 4, 2022, THE COMPANY ANNOUNCED A PTO SET TO EXPIRE ON AUGUST 31, 2022. ON AUGUST 31, 2022, THE FIRM TENDERED SHARES OF THE COMPANY WITHOUT ACCOUNTING FOR RELEVANT SHORT CALL OPTIONS POSITIONS WITH EXERCISE PRICES BELOW THE HIGHEST TENDER OFFER PRICE OR STATED AMOUNT OF THE CONSIDERATION OFFERED FOR THE COMPANY. CONSEQUENTLY, THE FIRM OVER-TENDERED 16,300 COMPANY SHARES IN THE PTO. AFTER APPLYING THE PRORATION FACTOR, 1,197 OF THE FIRM'S OVER-TENDERED SHARES WERE ACCEPTED, RESULTING IN ILL-GOTTEN GAINS FOR THE FIRM OF \$20,553. THE FINDINGS ALSO STATED THAT THE FIRM DID NOT HAVE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, CONCERNING EXCHANGE ACT RULE 14E-4.

Initiated By: NYSE AMERICAN LLC

Date Initiated: 01/12/2024

Docket/Case Number: 2022076480402

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/12/2024

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 \$10,000.00
Disgorgement/Restitution

Other Sanctions Ordered: PLUS INTEREST

Sanction Details: THE FIRM WAS CENSURED, A FINED \$10,000 (RESOLVED SIMULTANEOUSLY



WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000), AND ORDERED TO PAY DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST. THOSE MATTERS WERE BROUGHT BY NYSE ARCA AND FINRA.

Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION FINANCIAL MARKETS LLC ("VISION" OR "THE FIRM") CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT: ON AUGUST 31, 2022, VISION FINANCIAL MARKETS LLC VIOLATED SECURITIES EXCHANGE ACT OF 1934 RULE 14E-4 (PROHIBITED TRANSACTIONS IN CONNECTION WITH PARTIAL TENDER OFFERS) BY OVER-TENDERING 16,300 SHARES IN THE PARTIAL TENDER OFFER OF COMPANY 1. FROM AUGUST 2022 THROUGH FEBRUARY 2023, VISION FINANCIAL MARKETS LLC ALSO VIOLATED NYSE AMERICAN RULE 320 (OFFICES-APPROVAL, SUPERVISION AND CONTROL) BY FAILING TO HAVE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 14E-4.
Initiated By:	NYSE AMERICAN LLC
Date Initiated:	12/26/2023
Docket/Case Number:	2022076480402
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/12/2024
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	VISION WAS CENSURED AND ORDERED TO PAY A \$10,000 FINE (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000)



AND DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST TO NYSE AMERICAN LLC.

Firm Statement

VISION WAS CENSURED AND ORDERED TO PAY A \$10,000 FINE (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000) AND DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST TO NYSE AMERICAN LLC.

Disclosure 2 of 30

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 IT TENDERED MORE SHARES THAN IT WAS ENTITLED TO TENDER IN A COMPANY PARTIAL TENDER OFFER (PTO). THE FINDINGS STATED THAT THE COMPANY ANNOUNCED ITS PTO WITH AN EXPIRATION DATE OF AUGUST 31, 2022. ON THE EXPIRATION DATE, THE FIRM TENDERED SHARES OF THE COMPANY WITHOUT ACCOUNTING FOR RELEVANT SHORT CALL OPTIONS POSITIONS WITH EXERCISE PRICES BELOW THE HIGHEST TENDER OFFER PRICE OR STATED AMOUNT OF THE CONSIDERATION OFFERED FOR THE COMPANY. CONSEQUENTLY, THE FIRM OVER-TENDERED 16,300 COMPANY SHARES IN THE PTO. AFTER APPLYING THE PRORATION FACTOR, 1,197 OF THE FIRM'S OVER-TENDERED SHARES WERE ACCEPTED, RESULTING IN ILL-GOTTEN GAINS FOR THE FIRM OF \$20,553. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO HAVE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 14E-4.

Initiated By: NYSE ARCA, INC.

Date Initiated: 01/12/2024

Docket/Case Number: 2022076480403

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)



Resolution Date: 01/12/2024

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 \$10,000.00
Disgorgement/Restitution

Other Sanctions Ordered: PLUS INTEREST

Sanction Details: THE FIRM WAS CENSURED, FINED \$10,000 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000), AND ORDERED TO PAY DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST. THOSE MATTERS WERE BROUGHT BY NYSE AMERICAN AND FINRA.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION FINANCIAL MARKETS LLC ("VISION" OR "THE FIRM") CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT: ON AUGUST 31, 2022, VISION FINANCIAL MARKETS LLC VIOLATED SECURITIES EXCHANGE ACT OF 1934 RULE 14E-4 (PROHIBITED TRANSACTIONS IN CONNECTION WITH PARTIAL TENDER OFFERS) BY OVER-TENDERING 16,300 SHARES IN THE PARTIAL TENDER OFFER OF COMPANY 1. FROM AUGUST 2022 THROUGH FEBRUARY 2023, VISION FINANCIAL MARKETS LLC ALSO VIOLATED NYSE ARCA RULE 11.18(B) (SUPERVISORY SYSTEM) AND (C) (WRITTEN PROCEDURES) BY FAILING TO HAVE A SUPERVISORY SYSTEM AND WRITTEN SUPERVISORY PROCEDURES REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 14E-4.

Initiated By: NYSE ARCA, INC.

Date Initiated: 12/26/2023

Docket/Case Number: 2022076480403

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

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/12/2024
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	VISION WAS CENSURED AND ORDERED TO PAY A \$10,000 FINE (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000) AND DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST TO NYSE ARCA, INC.
Firm Statement	VISION WAS CENSURED AND ORDERED TO PAY A \$10,000 FINE (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000) AND DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST TO NYSE ARCA, INC.

Disclosure 3 of 30

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 IT TENDERED MORE SHARES THAN IT WAS ENTITLED TO TENDER IN A COMPANY PARTIAL TENDER OFFER (PTO). THE FINDINGS STATED THAT THE COMPANY ANNOUNCED ITS PTO WITH AN EXPIRATION DATE OF AUGUST 31, 2022. ON THE EXPIRATION DATE, THE FIRM TENDERED SHARES OF THE COMPANY WITHOUT ACCOUNTING FOR RELEVANT SHORT CALL OPTIONS POSITIONS WITH EXERCISE PRICES BELOW THE HIGHEST TENDER OFFER PRICE OR STATED AMOUNT OF THE CONSIDERATION OFFERED FOR THE COMPANY. CONSEQUENTLY, THE FIRM OVER-TENDERED 16,300 COMPANY SHARES IN THE PTO. AFTER APPLYING THE PRORATION FACTOR, 1,197 OF THE FIRM'S OVER-TENDERED SHARES WERE ACCEPTED, RESULTING IN ILL-GOTTEN GAINS FOR THE FIRM OF \$20,553. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO HAVE A SUPERVISORY SYSTEM, INCLUDING WSPS, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE



WITH EXCHANGE ACT RULE 14E-4.

Initiated By: FINRA

Date Initiated: 01/16/2024

Docket/Case Number: [2022076480401](#)

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 01/16/2024

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 \$10,000.00
Disgorgement/Restitution

Other Sanctions Ordered: PLUS INTEREST

Sanction Details: THE FIRM WAS CENSURED, FINED A TOTAL OF \$30,000, OF WHICH \$10,000 IS PAYABLE TO FINRA AND ORDERED TO PAY DISGORGEMENT IN THE TOTAL AMOUNT OF \$20,553, OF WHICH \$6,851 IS PAYABLE TO FINRA, PLUS INTEREST. ACCEPTANCE OF THIS AWC IS CONDITIONED UPON ACCEPTANCE OF PARALLEL SETTLEMENT AGREEMENTS IN THE SAME MATTER BETWEEN THE FIRM AND NYSE AMERICAN AND THE FIRM AND NYSE ARCA. FINE PAID IN FULL ON JANUARY 25, 2024.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION FINANCIAL MARKETS LLC ("VISION" OR "THE FIRM") CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT: ON AUGUST 31, 2022, VISION VIOLATED SECURITIES EXCHANGE ACT OF 1934 RULE 14E-4, "PROHIBITED



TRANSACTIONS IN CONNECTION WITH PARTIAL TENDER OFFERS," AND FINRA RULE 2010 BY OVER-TENDERING 16,300 SHARES IN THE PARTIAL TENDER OFFER (PTO) OF COMPANY 1. FROM AUGUST 2022 THROUGH FEBRUARY 2023, VISION VIOLATED FINRA RULES 3110(A) AND (B) AND 2010 BY FAILING TO HAVE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH EXCHANGE ACT RULE 14E-4.

Initiated By:	FINRA
Date Initiated:	12/26/2023
Docket/Case Number:	2022076480401
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	01/16/2024
Sanctions Ordered:	Censure Monetary/Fine \$10,000.00 Disgorgement/Restitution
Other Sanctions Ordered:	
Sanction Details:	VISION WAS CENSURED AND ORDERED TO PAY A \$10,000 FINE (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000) AND DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST TO FINRA.
Firm Statement	VISION WAS CENSURED AND ORDERED TO PAY A \$10,000 FINE (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR A TOTAL FINE OF \$30,000) AND DISGORGEMENT OF \$6,851 (RESOLVED SIMULTANEOUSLY WITH SIMILAR MATTERS FOR TOTAL DISGORGEMENT OF \$20,553), PLUS INTEREST TO FINRA.

Disclosure 4 of 30

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 IT AND ITS HEAD OF TRADING AND RISK, AND CURRENT CCO, BOOKED TRADES TO AN OPTIONS FLOOR BROKER'S ERROR ACCOUNT WHEN THEY KNEW, WERE RECKLESS IN NOT KNOWING, OR SHOULD HAVE KNOWN THAT THE TRADES WERE NOT MADE IN CONNECTION WITH THE CORRECTION OF A BONA FIDE ERROR. THE FINDINGS STATED THAT THE FLOOR BROKER USED ITS ERROR ACCOUNT AT THE FIRM TO BOOK NUMEROUS TRADES THAT WERE NOT MADE FOR THE PURPOSE OF CORRECTING BONA FIDE ERRORS. HOWEVER, THE FIRM AND THE CCO CONTINUED TO ALLOW THE FLOOR BROKER TO MISUSE THE ERROR ACCOUNT THAT IT HELD. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO PRESERVE BUSINESS COMMUNICATIONS SENT AND RECEIVED ON A PERSONAL DEVICE. THE CCO EXCHANGED NUMEROUS TEXT MESSAGES WITH THE FLOOR BROKER ON THE CCO'S PERSONAL CELL PHONE, WHICH WERE NOT PRESERVED BY THE FIRM AS REQUIRED. IN CONNECTION WITH ITS INVESTIGATION, NYSE REGULATION REQUESTED CERTAIN COMMUNICATIONS FROM THE FIRM AND THE CCO, BUT THE FIRM WAS UNABLE TO PROVIDE ALL COMMUNICATIONS RESPONSIVE TO NYSE REGULATION'S REQUEST. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO ESTABLISH AND MAINTAIN SUPERVISORY SYSTEMS AND WSPS THAT WERE REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH EXCHANGE ACT SECTION 17(A), EXCHANGE ACT RULE 17A-4, AND NYSE AMERICAN RULE AND 324. THE FIRM FAILED TO HAVE A SYSTEM OF FOLLOW-UP AND REVIEW REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH THE APPLICABLE RULES. IN ADDITION, THE FIRM'S POLICY UNREASONABLY DID NOT ADDRESS THE USE OF TEXT FOR BUSINESS COMMUNICATIONS BETWEEN EMPLOYEES, NOR DID IT SPECIFY THE NEED FOR PRESERVATION OF BUSINESS COMMUNICATIONS MORE GENERALLY.

Initiated By: NYSE AMERICAN LLC

Date Initiated: 08/25/2023

Docket/Case Number: 2021-06-28-00011

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: 08/25/2023

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 \$225,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$225,000.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION FINANCIAL MARKETS LLC ("VISION" OR "THE FIRM") CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT: 1) FROM MARCH 14, 2019 THROUGH JUNE 28, 2019, THE FIRM VIOLATED NYSE AMERICAN RULE 16 (BUSINESS CONDUCT) BY BOOKING TRADES TO AN OPTIONS FLOOR BROKER'S ERROR ACCOUNT WHEN IT KNEW, WAS RECKLESS IN NOT KNOWING, OR SHOULD HAVE KNOWN THAT THE TRADES WERE NOT MADE IN CONNECTION WITH THE CORRECTION OF A BONA FIDE ERROR. 2) FROM AT LEAST APRIL 12, 2019 THROUGH DECEMBER 10, 2021, VISION VIOLATED SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT"), RULE 17A-4(B)(4) THEREUNDER, AND NYSE AMERICAN RULE 324 (BOOKS AND RECORDS) BY FAILING TO PRESERVE BUSINESS COMMUNICATIONS SENT AND RECEIVED ON A PERSONAL DEVICE. 3) FROM AT LEAST APRIL 12, 2019 THROUGH DECEMBER 10, 2021, VISION VIOLATED NYSE AMERICAN RULE 320(E) (SUPERVISION) BY FAILING TO ESTABLISH AND MAINTAIN SUPERVISORY SYSTEMS AND WRITTEN SUPERVISORY PROCEDURES THAT WERE REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH EXCHANGE ACT SECTION 17(A), EXCHANGE ACT RULE 17A-4, AND NYSE AMERICAN RULE 324.

Initiated By: NYSE AMERICAN LLC

Date Initiated: 02/14/2023

Docket/Case Number: 2021-06-28-00011

Principal Product Type: Options

Other Product Type(s):



Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Consent
Resolution Date:	08/25/2023
Sanctions Ordered:	Censure Monetary/Fine \$225,000.00
Other Sanctions Ordered:	
Sanction Details:	VISION WAS CENSURED AND ORDERED TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$225,000 TO NYSE AMERICAN LLC.
Firm Statement	VISION WAS CENSURED AND ORDERED TO PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$225,000 TO NYSE AMERICAN LLC.

Disclosure 5 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO MONITOR FOR POTENTIALLY MANIPULATIVE TRADING ON ITS PLATFORM, SUCH AS LAYERING, SPOOFING, AND WASH TRADES. THE FINDINGS STATED THAT THE FIRM USED AN AUTOMATED SYSTEM FROM A THIRD-PARTY VENDOR THAT GENERATED ALERTS FOR POTENTIALLY SUSPICIOUS TRADING IN CUSTOMER ACCOUNTS. THE FIRM'S REVIEW OF THOSE ALERTS, HOWEVER, WAS UNREASONABLE IN SEVERAL RESPECTS. FIRST, THE FIRM FAILED TO DEDICATE SUFFICIENT RESOURCES TO THE REVIEW OF THE ALERTS. THE SYSTEM GENERATED NUMEROUS ALERTS INDICATING POTENTIAL MARKET MANIPULATION, INCLUDING LAYERING, WASH SALES AND ATS CROSS MANIPULATION. YET THE FIRM TASKED ONE PRINCIPAL WITH REVIEWING THE ALERTS. THE VOLUME OF ALERTS MADE IT IMPOSSIBLE FOR THE PRINCIPAL TO CONDUCT MEANINGFUL REVIEWS AND, IF NECESSARY, FOLLOW-UP INVESTIGATIONS, ESPECIALLY CONSIDERING THE PRINCIPAL'S OTHER RESPONSIBILITIES. SECOND, THE FIRM DID NOT INVESTIGATE THE ACTIVITY THAT GENERATED CERTAIN CATEGORIES OF ALERTS BECAUSE THE FIRM UNREASONABLY CONCLUDED THAT THESE TYPES OF ALERTS DID NOT INDICATE POTENTIALLY MANIPULATIVE ACTIVITY. THIS INCLUDED PRICE SPIKE</p>



ALERTS, WHICH OCCURRED WHEN A FIRM CUSTOMER'S ACCOUNT TRADED DURING OR WITHIN A SHORT TIME AFTER A SIGNIFICANT STOCK PRICE MOVEMENT, AND TRADE THROUGH OR SUB-PENNY QUOTING ALERTS, WHICH WERE TRIGGERED WHEN A CUSTOMER ACCOUNT EXECUTED OUTSIDE THE NATIONAL BEST BID AND OFFER ("NBBO") WITHOUT A PERMITTED EXCEPTION OR PLACED ORDERS AT SUB-PENNY PRICES. AS A RESULT, THE FIRM CLOSED NUMEROUS ALERTS GENERATED BY THE SYSTEM WITHOUT CONDUCTING ANY INVESTIGATION OR DOCUMENTING ANY INFORMATION ABOUT THE ALERT. THIRD, THE FIRM RELIED ON A MANUAL REVIEW OF DATA TO DETECT WHETHER ALERTS REGARDING POTENTIALLY MANIPULATIVE TRADING REFLECTED A BROADER PATTERN OF MANIPULATION BY CERTAIN TRADERS. THIS MANUAL REVIEW WAS UNREASONABLE GIVEN THE VOLUME AND COMPLEXITY OF THE TRADING BY THE FIRM'S CUSTOMERS. FINALLY, THE FIRM'S WSPS AND TRADE SURVEILLANCE PROCEDURES DID NOT PROVIDE REASONABLE GUIDANCE AS TO FACTORS TO CONSIDER WHEN ASSESSING THE VALIDITY OF ALERTS AND DOCUMENTING THEIR DISPOSITION. AS A RESULT, THE FIRM'S REVIEW OF ALERTS WAS OFTEN CURSORY. THE FIRM ALSO REGULARLY FAILED TO REFERENCE IN ITS DOCUMENTATION INFORMATION THAT WOULD BE RELEVANT TO AN ALERT REVIEW. THE FIRM FREQUENTLY USED THE SAME ROTE COMMENT TO CLOSE OUT THOUSANDS OF ALERTS. AS A RESULT OF THE FOREGOING, DURING THE TIME THAT IT WAS A NASDAQ MEMBER, THE FIRM VIOLATED NASDAQ RULE GENERAL 9, SECTIONS 1 AND 20. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH REASONABLE MARKET ACCESS CONTROLS AND PROCEDURES. THE FIRM DID NOT IMPLEMENT ANY ERRONEOUS ORDER CONTROLS THAT TOOK INTO ACCOUNT THE INDIVIDUAL CHARACTERISTICS OF A SECURITY, SUCH AS AN AVERAGE DAILY TRADING VOLUME CONTROL. ADDITIONALLY, THE FIRM DID NOT REVIEW THE REASONABLENESS OF ITS ERRONEOUS ORDER CONTROLS ON A REGULAR BASIS. AS A RESULT OF THE FOREGOING, DURING THE TIME THAT IT WAS A NASDAQ MEMBER, THE FIRM VIOLATED EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NASDAQ RULE GENERAL 9, SECTIONS 1 AND 20.

Initiated By: NASDAQ STOCK MARKET

Date Initiated: 09/16/2022

Docket/Case Number: 2019061702710

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:



Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/16/2022

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Censure
Monetary/Fine \$42,500.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED A TOTAL OF \$850,000, OF WHICH \$42,500 IS PAYABLE TO NASDAQ, AND REQUIRED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF ITS POLICIES, SYSTEMS, PROCEDURES (WRITTEN OR OTHERWISE) RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NASDAQ GENERAL RULE 9, SECTIONS 1 AND 20. THE REMAINDER OF THE FINE SHALL BE ALLOCATED TO NASDAQ PSX, LLC, NYSE ARCA, INC, THE NEW YORK STOCK EXCHANGE, LLC, NYSE NATIONAL, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., AND FINRA.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3-5(B) AND (C), AND NASDAQ RULE GENERAL 9, SECTIONS 1 AND 20.

Initiated By: THE NASDAQ STOCK MARKET LLC

Date Initiated: 08/15/2022

Docket/Case Number: 2019061702710



Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/16/2022
Sanctions Ordered:	Censure Monetary/Fine \$42,500.00
Other Sanctions Ordered:	RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY
Sanction Details:	1. CENSURE; 2. A TOTAL FINE OF \$850,000, OF WHICH \$42,500 IS PAYABLE TO NASDAQ; 3. AND RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3-5(B) AND (C), AND NASDAQ RULE GENERAL 9, SECTIONS 1 AND 20.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND NASDAQ RULE GENERAL 9, SECTIONS 1 AND 20. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$42,500 TO THE NASDAQ STOCK MARKET LLC.

Disclosure 6 of 30

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 IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES ("WSPS"), REASONABLY DESIGNED TO



MONITOR FOR POTENTIALLY MANIPULATIVE TRADING ON ITS PLATFORM, SUCH AS LAYERING, SPOOFING, AND WASH TRADES. THE FINDINGS STATED THAT THE FIRM USED AN AUTOMATED SYSTEM FROM A THIRD-PARTY VENDOR THAT GENERATED ALERTS FOR POTENTIALLY SUSPICIOUS TRADING IN CUSTOMER ACCOUNTS. THE FIRM'S REVIEW OF THOSE ALERTS, HOWEVER, WAS UNREASONABLE IN SEVERAL RESPECTS. FIRST, THE FIRM FAILED TO DEDICATE SUFFICIENT RESOURCES TO THE REVIEW OF THE ALERTS. THE SYSTEM GENERATED MORE THAN 250,000 ALERTS INDICATING POTENTIAL MARKET MANIPULATION, INCLUDING LAYERING, WASH SALES AND ALTERNATIVE TRADING SYSTEM ("ATS") CROSS MANIPULATION. YET THE FIRM TASKED ONE PRINCIPAL WITH REVIEWING THE ALERTS. THE VOLUME OF ALERTS MADE IT IMPOSSIBLE FOR THE PRINCIPAL TO CONDUCT MEANINGFUL REVIEWS AND, IF NECESSARY, FOLLOW-UP INVESTIGATIONS, ESPECIALLY CONSIDERING THE PRINCIPAL'S OTHER RESPONSIBILITIES. SECOND, THE FIRM DID NOT INVESTIGATE THE ACTIVITY THAT GENERATED CERTAIN CATEGORIES OF ALERTS BECAUSE THE FIRM UNREASONABLY CONCLUDED THAT THESE TYPES OF ALERTS DID NOT INDICATE POTENTIALLY MANIPULATIVE ACTIVITY. THIS INCLUDED PRICE SPIKE ALERTS, WHICH OCCURRED WHEN A FIRM CUSTOMER'S ACCOUNT TRADED DURING OR WITHIN A SHORT TIME AFTER A SIGNIFICANT STOCK PRICE MOVEMENT, AND TRADE THROUGH OR SUB-PENNY QUOTING ALERTS, WHICH WERE TRIGGERED WHEN A CUSTOMER ACCOUNT EXECUTED OUTSIDE THE NATIONAL BEST BID AND OFFER ("NBBO") WITHOUT A PERMITTED EXCEPTION OR PLACED ORDERS AT SUB-PENNY PRICES. AS A RESULT, THE FIRM CLOSED APPROXIMATELY 67,500 OF THE 250,000 ALERTS GENERATED BY THE SYSTEM WITHOUT CONDUCTING ANY INVESTIGATION OR DOCUMENTING ANY INFORMATION ABOUT THE ALERT. THIRD, THE FIRM RELIED ON A MANUAL REVIEW OF DATA TO DETECT WHETHER ALERTS REGARDING POTENTIALLY MANIPULATIVE TRADING REFLECTED A BROADER PATTERN OF MANIPULATION BY CERTAIN TRADERS. THIS MANUAL REVIEW WAS UNREASONABLE GIVEN THE VOLUME AND COMPLEXITY OF THE TRADING BY THE FIRM'S CUSTOMERS. FINALLY, THE FIRM'S WSPS AND TRADE SURVEILLANCE PROCEDURES DID NOT PROVIDE REASONABLE GUIDANCE AS TO FACTORS TO CONSIDER WHEN ASSESSING THE VALIDITY OF ALERTS AND DOCUMENTING THEIR DISPOSITION. AS A RESULT, THE FIRM'S REVIEW OF ALERTS WAS OFTEN CURSORY. THE FIRM ALSO REGULARLY FAILED TO REFERENCE IN ITS DOCUMENTATION INFORMATION THAT WOULD BE RELEVANT TO AN ALERT REVIEW. THE FIRM FREQUENTLY USED THE SAME ROTE COMMENT TO CLOSE OUT THOUSANDS OF ALERTS. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED PSX RULES 707 AND 748, AND SUBSEQUENTLY RULES OPTIONS 9, SECTION 1 AND GENERAL 9, SECTION 20, RESPECTIVELY. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH REASONABLE MARKET ACCESS CONTROLS AND PROCEDURES. THE FIRM'S WSPS



STATED THAT CREDIT LIMITS MUST BE (1) ESTABLISHED BASED ON CUSTOMER TRADING PATTERNS OR QUOTE HISTORY AND (2) REVIEWED PERIODICALLY. YET THE FIRM SET CREDIT LIMITS FOR ITS CUSTOMERS BASED ONLY ON THE BUYING POWER AVAILABLE IN THE ACCOUNTS AS REFLECTED BY THE CUSTOMER'S EXCESS FUNDS AT ACCOUNT OPENING AND DID NOT REVIEW THOSE CREDIT LIMITS PERIODICALLY, AS REQUIRED. THE FIRM DID NOT IMPLEMENT ANY ERRONEOUS ORDER CONTROLS THAT TOOK INTO ACCOUNT THE INDIVIDUAL CHARACTERISTICS OF A SECURITY, SUCH AS AN AVERAGE DAILY TRADING VOLUME CONTROL. ADDITIONALLY, THE FIRM DID NOT REVIEW THE REASONABLENESS OF ITS ERRONEOUS ORDER CONTROLS ON A REGULAR BASIS. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, PSX RULES 707 AND 748, AND SUBSEQUENTLY RULES OPTIONS 9, SECTION 1 AND GENERAL 9, SECTION 20, RESPECTIVELY.

Initiated By: NASDAQ PSX LLC

Date Initiated: 09/16/2022

Docket/Case Number: 2019061702706

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/16/2022

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Censure
Monetary/Fine \$95,625.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED A TOTAL OF \$850,000, OF WHICH \$95,625 IS PAYABLE TO PSX, AND REQUIRED TO RETAIN AN INDEPENDENT CONSULTANT NOT UNACCEPTABLE TO THE EXCHANGE TO CONDUCT A



COMPREHENSIVE REVIEW OF THE REASONABLENESS OF ITS POLICIES, SYSTEMS, PROCEDURES (WRITTEN OR OTHERWISE) RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND PSX RULE GENERAL 9, SECTIONS 1 AND 20. THE REMAINDER OF THE FINE SHALL BE ALLOCATED TO NYSE ARCA, INC, THE NEW YORK STOCK EXCHANGE, LLC, NYSE NATIONAL, INC., CBOE BYX EXCHANGE, INC., CBOE BZX EXCHANGE, INC., CBOE EDGA EXCHANGE, INC., CBOE EDGX EXCHANGE, INC., THE NASDAQ STOCK MARKET, LLC, NASDAQ PSX, LLC, AND FINRA.

Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3- 5(B) AND (C), PSX RULES 707 AND 748, AND SUBSEQUENTLY RULES OPTIONS 9, SECTION 1 AND GENERAL 9, SECTION 20.
Initiated By:	NASDAQ PSX LLC
Date Initiated:	08/15/2022
Docket/Case Number:	2019061702706
Principal Product Type:	Equity - OTC
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/16/2022
Sanctions Ordered:	Censure Monetary/Fine \$95,625.00
Other Sanctions Ordered:	RETAIN AN INDEPENDENT CONSULTANT.
Sanction Details:	1. CENSURE;



2. A TOTAL FINE OF \$850,000, OF WHICH \$95,625 IS PAYABLE TO PSX;
 3. RETAIN AN INDEPENDENT CONSULTANT NOT UNACCEPTABLE TO THE EXCHANGE TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF ITS POLICIES, SYSTEMS, PROCEDURES (WRITTEN OR OTHERWISE) RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND PSX RULE GENERAL 9, SECTIONS 1 AND 20.

Firm Statement

VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), PSX RULES 707 AND 748, AND SUBSEQUENTLY RULES OPTIONS 9, SECTION 1 AND GENERAL 9, SECTION 20. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO NASDAQ PSX LLC.

Disclosure 7 of 30

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 IT FAILED TO DEVELOP AND IMPLEMENT AN ANTI-MONEY LAUNDERING (AML) PROGRAM REASONABLY DESIGNED TO ACHIEVE AND MONITOR THE FIRM'S COMPLIANCE WITH THE BANK SECRECY ACT AND THE IMPLEMENTING REGULATIONS THEREUNDER. THE FINDINGS STATED THAT THE FIRM DID NOT ESTABLISH AND IMPLEMENT POLICIES AND PROCEDURES TAILORED TO THE FIRM'S BUSINESS, WHICH COULD BE REASONABLY EXPECTED TO DETECT AND CAUSE THE REPORTING OF SUSPICIOUS ACTIVITY ARISING FROM TRANSACTIONS AND MONEY MOVEMENTS IN DOMESTIC AND FOREIGN-BASED RETAIL ACCOUNTS. FIRST, THE FIRM'S WRITTEN AML PROCEDURES WERE NOT REASONABLY DESIGNED FOR THE SURVEILLANCE OF POTENTIALLY SUSPICIOUS TRADING AND MONEY MOVEMENTS IN CUSTOMER ACCOUNTS. ALTHOUGH THE FIRM'S WRITTEN PROCEDURES IDENTIFIED EXCEPTION REPORTS FOR THE FIRM TO USE TO ASSIST WITH IDENTIFYING SUSPICIOUS ACTIVITY, THE PROCEDURES DID NOT DESCRIBE HOW SUPERVISORS SHOULD USE THESE REPORTS, OR WHAT ACTIVITY SHOULD TRIGGER FURTHER ACTION BY SUPERVISORS OR THE FIRM. THE FIRM'S PROCEDURES ALSO WERE NOT REASONABLY TAILORED TO THE FIRM'S BUSINESS. LIKEWISE, ALTHOUGH THE FIRM'S PROCEDURES REQUIRED THE FIRM TO CREATE, AND REVIEW



A WATCH LIST OF HIGH-RISK CLIENTS, THE PROCEDURES DID NOT DESCRIBE WHAT INFORMATION THE WATCH LIST SHOULD CONTAIN OR STATE HOW OFTEN THE FIRM SHOULD MONITOR THE LIST FOR ACCURACY OR COMPLETENESS. SECOND, THE FIRM DID NOT REGULARLY USE ANY EXCEPTION REPORTS OR AUTOMATED TOOLS TO MONITOR CUSTOMER TRANSACTIONS FOR SUSPICIOUS ACTIVITY. INSTEAD, THE FIRM RELIED ALMOST EXCLUSIVELY ON A MANUAL REVIEW OF THE DAILY TRADE BLOTTER AND MONEY MOVEMENT REPORTS TO IDENTIFY SUSPICIOUS TRADING. INDEED, EVEN FOR THE ACCOUNTS THAT THE FIRM IDENTIFIED AS HIGH-RISK AND PLACED ON THE WATCH LIST, THE FIRM PRIMARILY RELIED ON A MANUAL REVIEW OF A PORTION OF THE TRADE BLOTTER THAT REFLECTED TRADES IN ONLY SOME OF THE ACCOUNTS PLACED ON THE WATCH LIST. MOREOVER, EVEN AFTER THE FIRM IMPLEMENTED AN AUTOMATED SURVEILLANCE SYSTEM FROM A THIRD-PARTY VENDOR, THE FIRM DID NOT REASONABLY MONITOR ORDER DATA, AND CONTINUED TO FAIL TO TIMELY DETECT AND INVESTIGATE CERTAIN POTENTIALLY SUSPICIOUS ACTIVITY. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO TIMELY OR REASONABLY DETECT, INVESTIGATE, AND RESPOND TO NUMEROUS POTENTIALLY SUSPICIOUS ACTIVITIES BY RETAIL CUSTOMERS. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM USED AN AUTOMATED SYSTEM FROM A THIRD-PARTY VENDOR THAT GENERATED ALERTS FOR POTENTIALLY SUSPICIOUS TRADING IN CUSTOMER ACCOUNTS THAT WAS UNREASONABLE IN SEVERAL RESPECTS. FIRST, THE FIRM FAILED TO DEDICATE SUFFICIENT RESOURCES TO THE REVIEW OF THE ALERTS. SECOND, THE FIRM DID NOT INVESTIGATE THE ACTIVITY THAT GENERATED CERTAIN CATEGORIES OF ALERTS BECAUSE THE FIRMS UNREASONABLY CONCLUDED THAT THESE TYPES OF ALERTS DID NOT INDICATE POTENTIALLY MANIPULATIVE ACTIVITY. THIRD, THE FIRM RELIED ON A MANUAL REVIEW OF DATA TO DETECT WHETHER ALERTS REGARDING POTENTIALLY MANIPULATIVE TRADING REFLECTED A BROADER PATTERN OF MANIPULATION BY CERTAIN TRADERS. FINALLY, THE FIRM'S WSPS AND TRADE SURVEILLANCE PROCEDURES DID NOT PROVIDE REASONABLE GUIDANCE AS TO FACTORS TO CONSIDER WHEN ASSESSING THE VALIDITY OF ALERTS AND DOCUMENTING THEIR DISPOSITION. FINRA FOUND THAT THE FIRM FAILED TO ESTABLISH REASONABLE MARKET ACCESS CONTROLS AND PROCEDURES. THE FIRM DID NOT IMPLEMENT ANY ERRONEOUS ORDER CONTROLS THAT TOOK INTO ACCOUNT THE INDIVIDUAL CHARACTERISTICS OF A SECURITY, SUCH AS AN AVERAGE DAILY TRADING VOLUME CONTROL. IN ADDITION, THE FIRM DID NOT REVIEW THE REASONABLENESS OF ITS ERRONEOUS ORDER CONTROLS ON A REGULAR BASIS. AS A RESULT, THE FIRM VIOLATED EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER.



Initiated By:	FINRA
Date Initiated:	09/16/2022
Docket/Case Number:	2019061702701
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	09/16/2022
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Sanctions Ordered:	Censure Monetary/Fine \$95,625.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED JOINTLY AND SEVERALLY A TOTAL OF \$850,000, OF WHICH \$95,625 IS PAYABLE TO FINRA, AND REQUIRED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF THE FIRM'S POLICIES, SYSTEMS, PROCEDURES (WRITTEN AND OTHERWISE), AND TRAINING RELATING TO ITS COMPLIANCE WITH FINRA RULE 3310 AND THE REQUIREMENTS OF THE BANK SECRECY ACT, 31 USC §5311, ET SEQ., AND THE REGULATIONS PROMULGATED THEREUNDER; AND FINRA RULE 3110 RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY; AND THE FIRM'S COMPLIANCE WITH EXCHANGE ACT § 15(C)(3) AND RULE 15C3-5(B) AND (C) THEREUNDER. FINE PAID IN FULL ON SEPTEMBER 28, 2022.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED



TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM SEPTEMBER 2016 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3-5(B) AND (C), AND FINRA RULE 2010.

Initiated By: FINANCIAL INDUSTRY REGULATORY AUTHORITY (FINRA)

Date Initiated: 08/15/2022

Docket/Case Number: [2019061702701](#)

Principal Product Type: Equity - OTC

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 09/16/2022

Sanctions Ordered: Censure
Monetary/Fine \$95,625.00

Other Sanctions Ordered: AN UNDERTAKING TO RETAIN AN INDEPENDENT CONSULTANT

Sanction Details: A CENSURE;
JOINT AND SEVERAL FINE PAYABLE TO FINRA IN THE AMOUNT OF \$95,625 (RESOLVED WITH ADDITIONAL MATTERS FOR A TOTAL FINE OF \$850,000);
AN UNDERTAKING TO RETAIN AN INDEPENDENT CONSULTANT

Firm Statement VISION FINANCIAL MARKETS LLC ("VFM") AND VISION BROKERAGE SERVICES LLC ("VBS") WERE CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND FINRA RULE 2010. VFM AND VBS SHALL JOINTLY PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO FINRA.

Disclosure 8 of 30

Reporting Source: Regulator

Current Status: Final



Allegations: VISION FINANCIAL MARKETS LLC VIOLATED EDGA RULE 5.1 IN THAT THE FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM ALSO VIOLATED RULE 15C3-5(B), (C)(1), AND (C)(2)(III) AND EDGA RULE 3.2 IN THAT THE FIRM'S FINANCIAL RISK MANAGEMENT CONTROLS AND PROCEDURES WERE NOT REASONABLY DESIGNED TO MANAGE THE FINANCIAL AND REGULATORY RISKS OF ITS BUSINESS.

Initiated By: CBOE EDGA EXCHANGE, INC.

Date Initiated: 08/04/2022

Docket/Case Number: STAR NO. 20190617027-04/FILE NO. USRI-9938-08/URE-21-08

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

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: 08/08/2022

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 \$95,625.00

Other Sanctions Ordered:

Sanction Details: A CENSURE, A MONETARY FINE IN THE AMOUNT OF \$95,625, AND AN UNDERTAKING TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3-5(B) AND (C), AND EDGA RULES 3.2 AND 5.1.

Reporting Source: Firm



Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3-5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1.
Initiated By:	CBOE EDGA EXCHANGE, INC
Date Initiated:	08/04/2022
Docket/Case Number:	STAR NO. 20190617027-04/FILE NO. USRI-9938-08/URE-21-08
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	08/04/2022
Sanctions Ordered:	Monetary/Fine \$95,625.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE NEW YORK STOCK EXCHANGE LLC.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO CBOE EDGA EXCHANGE, INC.

Disclosure 9 of 30

Reporting Source:	Regulator
Current Status:	Final



Allegations:	VISION FINANCIAL MARKETS LLC VIOLATED BYX RULE 5.1 IN THAT THE FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM ALSO VIOLATED RULE 15C3-5(B), (C)(1), AND (C)(2)(III) AND BYX RULE 3.2 IN THAT THE FIRM'S RISK MANAGEMENT CONTROLS AND PROCEDURES WERE NOT REASONABLY DESIGNED TO MANAGE THE FINANCIAL AND REGULATORY RISKS OF ITS BUSINESS.
Initiated By:	CBOE BYX EXCHANGE, INC.
Date Initiated:	08/04/2022
Docket/Case Number:	STAR NO. 20190617027-02/FILE NO. USRI-9938-06/URE-21-06
Principal Product Type:	Equity Listed (Common & Preferred Stock)
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:	08/08/2022
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 \$95,625.00
Other Sanctions Ordered:	AN UNDERTAKING
Sanction Details:	A CENSURE, A MONETARY FINE IN THE AMOUNT OF \$95,625, AND AN UNDERTAKING TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3-5(B) AND (C) AND BYX RULES 3.2 AND 5.1.
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Reporting Source:	Firm
Current Status:	Final



Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3-5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1.
Initiated By:	CBOE BYX EXCHANGE, INC.
Date Initiated:	08/04/2022
Docket/Case Number:	STAR NO. 20190617027-02/FILE NO. USRI-9938-06/URE-21-06
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	08/19/2022
Sanctions Ordered:	Monetary/Fine \$95,625.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE CBOE.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO CBOE BYX EXCHANGE, INC.

Disclosure 10 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	VISION FINANCIAL MARKETS LLC VIOLATED EDGX RULE 5.1 IN THAT THE



FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. VISION ALSO VIOLATED RULE 15C3-5(B), (C)(1), AND (C)(2)(III) AND EXCHANGE RULES 3.2 IN THAT THE FIRM'S FINANCIAL RISK MANAGEMENT CONTROLS AND PROCEDURES WERE NOT REASONABLY DESIGNED TO MANAGE THE FINANCIAL AND REGULATORY RISKS OF ITS BUSINESS.

Initiated By: CBOE EDGX EXCHANGE, INC.

Date Initiated: 08/04/2022

Docket/Case Number: STAR NO. 20190617027-05/FILE NO. USRI-9938-07/URE-21-07

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

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: 08/08/2022

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 \$95,625.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: A CENSURE, A MONETARY FINE IN THE AMOUNT OF \$95,625, AND AN UNDERTAKING TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3-5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1.

Reporting Source: Firm

Current Status: Final



Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3-5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1.
Initiated By:	CBOE EDGX EXCHANGE, INC.
Date Initiated:	08/04/2022
Docket/Case Number:	STAR NO. STAR NO. 20190617027-05/FILE NO. USRI-9938-07/URE-21-07
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	08/04/2022
Sanctions Ordered:	Monetary/Fine \$95,625.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE NEW YORK STOCK EXCHANGE LLC.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO CBOE EDGX EXCHANGE, INC.

Disclosure 11 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	VISION FINANCIAL MARKETS LLC VIOLATED BZX RULE 5.1 IN THAT THE



FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. VISION FINANCIAL MARKETS LLC ALSO VIOLATED RULE 15C3-5(B), (C)(1), AND (C)(2)(III) AND BZX RULE 3.2 IN THAT THE FIRM'S RISK MANAGEMENT CONTROLS AND PROCEDURES WERE NOT REASONABLY DESIGNED TO MANAGE THE FINANCIAL AND REGULATORY RISKS OF ITS BUSINESS.

Initiated By: CBOE BZX EXCHANGE, INC.

Date Initiated: 08/04/2022

Docket/Case Number: STAR NO. 20190617027-03/FILE NO. USRI-9938-05/URE-21-05

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

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: 08/08/2022

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 \$95,625.00

Other Sanctions Ordered: AN UNDERTAKING

Sanction Details: A CENSURE, A MONETARY FINE IN THE AMOUNT OF \$95,625, AND AN UNDERTAKING TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3-5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1.

Reporting Source: Firm

Current Status: Final



Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM DID NOT HAVE POLICIES, SYSTEMS, AND PROCEDURES REASONABLY DESIGNED TO DETECT AND PREVENT POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLY WITH RULE 15C3-5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1.
Initiated By:	CBOE BZX EXCHANGE, INC.
Date Initiated:	08/04/2022
Docket/Case Number:	STAR NO. 20190617027-03/FILE NO. USRI-9938-05/URE-21-05
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	08/19/2022
Sanctions Ordered:	Monetary/Fine \$95,625.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE CBOE
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND EXCHANGE RULES 3.2 AND 5.1. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO CBOE BZX EXCHANGE, INC.

Disclosure 12 of 30

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 IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS, AND RULES PROHIBITING MANIPULATIVE TRADING. THE FINDINGS STATED THAT THE FIRM PROVIDED ITS CUSTOMERS WITH DIRECT MARKET ACCESS TO AN ATS AND MULTIPLE EXCHANGES BUT FAILED TO ESTABLISH, DOCUMENT, AND MAINTAIN FINANCIAL RISK MANAGEMENT CONTROLS AND PROCEDURES REASONABLY DESIGNED TO LIMIT THE FINANCIAL AND REGULATORY RISKS ASSOCIATED WITH THIS ACTIVITY. THE FIRM'S FAILURES RESULTED IN POTENTIALLY MANIPULATIVE TRADING AND ORDERS ENTERING THE MARKETS WITHOUT BEING SUBJECT TO REASONABLY DESIGNED RISK MANAGEMENT CONTROLS. ACCORDINGLY, THE FIRM VIOLATED NYSE RULE 3110, SECTION 15(C)(3) OF THE SECURITIES EXCHANGE ACT OF 1934, AND RULE 15C3-5 THEREUNDER. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM USED AN AUTOMATED SYSTEM FROM A THIRD-PARTY VENDOR THAT GENERATED ALERTS FOR POTENTIALLY SUSPICIOUS TRADING IN CUSTOMER ACCOUNTS. THE FIRM'S REVIEW OF THOSE ALERTS, HOWEVER, WAS UNREASONABLE IN SEVERAL RESPECTS. FIRST, THE FIRM FAILED TO DEDICATE SUFFICIENT RESOURCES TO THE REVIEW OF THE ALERTS. THE SYSTEM GENERATED MORE THAN 250,000 ALERTS INDICATING POTENTIAL MARKET MANIPULATION, INCLUDING LAYERING, WASH SALES AND ATS CROSS MANIPULATION. YET THE FIRM TASKED ONE PRINCIPAL WITH REVIEWING THE ALERTS. THE VOLUME OF ALERTS MADE IT IMPOSSIBLE FOR THE PRINCIPAL TO CONDUCT REASONABLE REVIEWS AND FOLLOW-UP INVESTIGATIONS, ESPECIALLY CONSIDERING THE PRINCIPAL'S OTHER RESPONSIBILITIES. SECOND, THE FIRM DID NOT INVESTIGATE THE ACTIVITY THAT GENERATED CERTAIN CATEGORIES OF ALERTS BECAUSE THE FIRM UNREASONABLY CONCLUDED THAT THESE TYPES OF ALERTS DID NOT INDICATE POTENTIALLY MANIPULATIVE ACTIVITY. AS A RESULT, THE FIRM CLOSED APPROXIMATELY 67,500 OF THE 250,000 ALERTS GENERATED BY THE SYSTEM WITHOUT CONDUCTING ANY INVESTIGATION OR DOCUMENTING ANY INFORMATION ABOUT THE ALERT. THIRD, THE FIRM RELIED ON A MANUAL REVIEW OF DATA TO DETECT WHETHER ALERTS REGARDING POTENTIALLY MANIPULATIVE TRADING REFLECTED A BROADER PATTERN OF MANIPULATION BY CERTAIN TRADERS. THIS MANUAL REVIEW WAS UNREASONABLE GIVEN THE VOLUME AND COMPLEXITY OF THE TRADING BY THE FIRM'S CUSTOMERS. FINALLY, THE FIRM'S WSPS AND TRADE SURVEILLANCE PROCEDURES DID NOT PROVIDE REASONABLE GUIDANCE AS TO FACTORS TO CONSIDER WHEN ASSESSING THE VALIDITY OF ALERTS AND DOCUMENTING THEIR DISPOSITION. AS A RESULT, THE FIRM'S REVIEW OF ALERTS WAS OFTEN CURSORY. THE FIRM ALSO REGULARLY FAILED TO REFERENCE IN ITS



DOCUMENTATION INFORMATION THAT WOULD BE RELEVANT TO AN ALERT REVIEW. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED NYSE RULES 3110(A) AND (B). THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO ESTABLISH REASONABLE MARKET ACCESS CONTROLS AND PROCEDURES. THE FIRM'S WSPS STATED THAT IT REVIEWED AND VETTED CUSTOMERS WITH ACCESS TO ITS TRADING SYSTEMS. HOWEVER, THE FIRM PERMITTED CERTAIN CUSTOMERS TO GRANT ACCESS TO THE FIRM'S ORDER MANAGEMENT SYSTEM TO HUNDREDS OF INDIVIDUAL TRADERS WITHOUT THE FIRM'S REVIEW OR PREAPPROVAL. THE ACTIVITY OF THESE CUSTOMERS GENERATED A SIGNIFICANT NUMBER OF ALERTS FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM SET CREDIT LIMITS FOR ITS CUSTOMERS BASED ONLY ON THE BUYING POWER AVAILABLE IN THE ACCOUNTS, AS REFLECTED BY THE CUSTOMER'S EXCESS FUNDS AT ACCOUNT OPENING, AND DID NOT REVIEW THOSE CREDIT LIMITS PERIODICALLY, AS REQUIRED. THE FIRM DID NOT IMPLEMENT ANY ERRONEOUS ORDER CONTROLS THAT TOOK INTO ACCOUNT THE INDIVIDUAL CHARACTERISTICS OF A SECURITY. ADDITIONALLY, THE FIRM DID NOT REVIEW THE REASONABLENESS OF ITS ERRONEOUS ORDER CONTROLS ON A REGULAR BASIS. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NYSE RULE 3110.

Initiated By:	NEW YORK STOCK EXCHANGE
Date Initiated:	08/15/2022
Docket/Case Number:	2019061702708
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	08/15/2022
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Sanctions Ordered:	Censure



Monetary/Fine \$95,625.00

Other Sanctions Ordered:

UNDERTAKING

Sanction Details:

THE FIRM WAS CENSURED, FINED A TOTAL OF \$850,000, OF WHICH \$95,625 IS PAYABLE TO NYSE, AND REQUIRED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF ITS POLICIES, SYSTEMS, PROCEDURES (WRITTEN OR OTHERWISE) RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NYSE RULE 3110.

Reporting Source:

Firm

Current Status:

Final

Allegations:

WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM JUNE 2019 THROUGH DECEMBER 2020 THE FIRM VIOLATED NYSE RULE 3110 BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS, AND RULES PROHIBITING MANIPULATIVE TRADING. VISION ALSO VIOLATED SECTION 15(C)(3) OF THE SECURITIES EXCHANGE ACT OF 1934, RULE 15C3-5 THEREUNDER (THE "MARKET ACCESS RULE"), AND NYSE RULE 3110, BY FAILING TO ESTABLISH, DOCUMENT, AND MAINTAIN A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES REASONABLY DESIGNED TO LIMIT THE FINANCIAL AND REGULATORY RISKS ASSOCIATED WITH PROVIDING MARKET ACCESS.

Initiated By:

THE NEW YORK STOCK EXCHANGE LLC

Date Initiated:

08/15/2022

Docket/Case Number:

2019061702708

Principal Product Type:

Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:



Resolution:	Settled
Resolution Date:	08/19/2022
Sanctions Ordered:	Monetary/Fine \$95,625.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE NEW YORK STOCK EXCHANGE LLC.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND NYSE RULE 3110. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE NEW YORK STOCK EXCHANGE LLC.

Disclosure 13 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	<p>WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS, AND RULES PROHIBITING MANIPULATIVE TRADING. THE FINDINGS STATED THAT THE FIRM PROVIDED ITS CUSTOMERS WITH DIRECT MARKET ACCESS TO AN ATS AND MULTIPLE EXCHANGES BUT FAILED TO ESTABLISH, DOCUMENT, AND MAINTAIN FINANCIAL RISK MANAGEMENT CONTROLS AND PROCEDURES REASONABLY DESIGNED TO LIMIT THE FINANCIAL AND REGULATORY RISKS ASSOCIATED WITH THIS ACTIVITY. THE FIRM'S FAILURES RESULTED IN POTENTIALLY MANIPULATIVE TRADING AND ORDERS ENTERING THE MARKETS WITHOUT BEING SUBJECTED TO REASONABLY DESIGNED RISK MANAGEMENT CONTROLS. ACCORDINGLY, THE FIRM VIOLATED NYSE ARCA RULE 11.18, SECTION 15(C)(3) OF THE EXCHANGE ACT, AND RULE 15C3-5 THEREUNDER. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM USED AN AUTOMATED SYSTEM FROM A THIRD-PARTY VENDOR THAT GENERATED ALERTS FOR POTENTIALLY SUSPICIOUS TRADING IN CUSTOMER ACCOUNTS. THE FIRM'S REVIEW OF THOSE ALERTS, HOWEVER, WAS UNREASONABLE IN SEVERAL RESPECTS. FIRST, THE</p>



FIRM FAILED TO DEDICATE SUFFICIENT RESOURCES TO THE REVIEW OF THE ALERTS. THE SYSTEM GENERATED MORE THAN 250,000 ALERTS INDICATING POTENTIAL MARKET MANIPULATION, INCLUDING LAYERING, WASH SALES AND ATS CROSS MANIPULATION. YET THE FIRM TASKED ONE PRINCIPAL WITH REVIEWING THE ALERTS. THE VOLUME OF ALERTS MADE IT IMPOSSIBLE FOR THE PRINCIPAL TO CONDUCT REASONABLE REVIEWS AND FOLLOW-UP INVESTIGATIONS, ESPECIALLY CONSIDERING THE PRINCIPAL'S OTHER RESPONSIBILITIES. SECOND, THE FIRM DID NOT INVESTIGATE THE ACTIVITY THAT GENERATED CERTAIN CATEGORIES OF ALERTS BECAUSE THE FIRM UNREASONABLY CONCLUDED THAT THESE TYPES OF ALERTS DID NOT INDICATE POTENTIALLY MANIPULATIVE ACTIVITY. AS A RESULT, THE FIRM CLOSED APPROXIMATELY 67,500 OF THE 250,000 ALERTS GENERATED BY THE SYSTEM WITHOUT CONDUCTING ANY INVESTIGATION OR DOCUMENTING ANY INFORMATION ABOUT THE ALERT. THIRD, THE FIRM RELIED ON A MANUAL REVIEW OF DATA TO DETECT WHETHER ALERTS REGARDING POTENTIALLY MANIPULATIVE TRADING REFLECTED A BROADER PATTERN OF MANIPULATION BY CERTAIN TRADERS. THIS MANUAL REVIEW WAS UNREASONABLE GIVEN THE VOLUME AND COMPLEXITY OF THE TRADING BY THE FIRM'S CUSTOMERS. FINALLY, THE FIRM'S WSPS AND TRADE SURVEILLANCE PROCEDURES DID NOT PROVIDE REASONABLE GUIDANCE AS TO FACTORS TO CONSIDER WHEN ASSESSING THE VALIDITY OF ALERTS AND DOCUMENTING THEIR DISPOSITION. AS A RESULT, THE FIRM'S REVIEW OF ALERTS WAS OFTEN CURSORY. THE FIRM ALSO REGULARLY FAILED TO REFERENCE IN ITS DOCUMENTATION INFORMATION THAT WOULD BE RELEVANT TO AN ALERT REVIEW. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED NYSE ARCA RULES 11.18(B) AND (C). THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO ESTABLISH REASONABLE MARKET ACCESS CONTROLS AND PROCEDURES. THE FIRM'S WSPS STATED THAT IT REVIEWED AND VETTED CUSTOMERS WITH ACCESS TO ITS TRADING SYSTEMS. HOWEVER, THE FIRM PERMITTED CERTAIN CUSTOMERS TO GRANT ACCESS TO THE FIRM'S ORDER MANAGEMENT SYSTEM TO HUNDREDS OF INDIVIDUAL TRADERS WITHOUT THE FIRM'S REVIEW OR PREAPPROVAL. THE ACTIVITY OF THESE CUSTOMERS GENERATED A SIGNIFICANT NUMBER OF ALERTS FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM SET CREDIT LIMITS FOR ITS CUSTOMERS BASED ONLY ON THE BUYING POWER AVAILABLE IN THE ACCOUNTS, AS REFLECTED BY THE CUSTOMER'S EXCESS FUNDS AT ACCOUNT OPENING, AND DID NOT REVIEW THOSE CREDIT LIMITS PERIODICALLY, AS REQUIRED. THE FIRM DID NOT IMPLEMENT ANY ERRONEOUS ORDER CONTROLS THAT TOOK INTO ACCOUNT THE INDIVIDUAL CHARACTERISTICS OF A SECURITY. ADDITIONALLY, THE FIRM DID NOT REVIEW THE REASONABLENESS OF ITS ERRONEOUS ORDER CONTROLS ON A REGULAR BASIS. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NYSE ARCA RULE 11.18(A).



Initiated By: NYSE ARCA, INC.

Date Initiated: 08/15/2022

Docket/Case Number: 2019061702707

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/15/2022

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Censure
Monetary/Fine \$95,625.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED A TOTAL OF \$850,000, OF WHICH \$95,625 IS PAYABLE TO NYSE ARCA, AND REQUIRED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF ITS POLICIES, SYSTEMS, PROCEDURES (WRITTEN OR OTHERWISE) RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NYSE ARCA RULE 11.18.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM AUGUST 2018 THROUGH DECEMBER 2020 THE FIRM VIOLATED NYSE ARCA RULE 11.18 BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY



DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS, AND RULES PROHIBITING MANIPULATIVE TRADING. VISION ALSO VIOLATED SECTION 15(C)(3) OF THE SECURITIES EXCHANGE ACT OF 1934, RULE 15C3-5 THEREUNDER (THE "MARKET ACCESS RULE"), AND NYSE ARCA RULE 11.18, BY FAILING TO ESTABLISH, DOCUMENT, AND MAINTAIN A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES REASONABLY DESIGNED TO LIMIT THE FINANCIAL AND REGULATORY RISKS ASSOCIATED WITH PROVIDING MARKET ACCESS.

Initiated By:	NYSE ARCA, INC.
Date Initiated:	08/15/2022
Docket/Case Number:	NO. 2019061702707
Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	08/19/2022
Sanctions Ordered:	Monetary/Fine \$95,625.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO THE NEW YORK STOCK EXCHANGE ARCA.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND NYSE ARCA RULE 11.18. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$95,625 TO NYSE ARCA, INC.

**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 IT FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES (WSPS), REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS, AND RULES PROHIBITING MANIPULATIVE TRADING. THE FINDINGS STATED THAT THE FIRM PROVIDED ITS CUSTOMERS WITH DIRECT MARKET ACCESS TO AN ATS AND MULTIPLE EXCHANGES BUT FAILED TO ESTABLISH, DOCUMENT, AND MAINTAIN FINANCIAL RISK MANAGEMENT CONTROLS AND PROCEDURES REASONABLY DESIGNED TO LIMIT THE FINANCIAL AND REGULATORY RISKS ASSOCIATED WITH THIS ACTIVITY. THE FIRM'S FAILURES RESULTED IN POTENTIALLY MANIPULATIVE TRADING AND ORDERS ENTERING THE MARKETS WITHOUT BEING SUBJECTED TO REASONABLY DESIGNED RISK MANAGEMENT CONTROLS. ACCORDINGLY, THE FIRM VIOLATED NYSE NATIONAL RULE 11.5.1, SECTION 15(C)(3) OF THE EXCHANGE ACT, AND RULE 15C3-5 THEREUNDER. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO REASONABLY SUPERVISE FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM USED AN AUTOMATED SYSTEM FROM A THIRD-PARTY VENDOR THAT GENERATED ALERTS FOR POTENTIALLY SUSPICIOUS TRADING IN CUSTOMER ACCOUNTS. THE FIRM'S REVIEW OF THOSE ALERTS, HOWEVER, WAS UNREASONABLE IN SEVERAL RESPECTS. FIRST, THE FIRM FAILED TO DEDICATE SUFFICIENT RESOURCES TO THE REVIEW OF THE ALERTS. THE SYSTEM GENERATED MORE THAN 250,000 ALERTS INDICATING POTENTIAL MARKET MANIPULATION, INCLUDING LAYERING, WASH SALES AND ATS CROSS MANIPULATION. YET THE FIRM TASKED ONE PRINCIPAL WITH REVIEWING THE ALERTS. THE VOLUME OF ALERTS MADE IT IMPOSSIBLE FOR THE PRINCIPAL TO CONDUCT REASONABLE REVIEWS AND FOLLOW-UP INVESTIGATIONS, ESPECIALLY CONSIDERING THE PRINCIPAL'S OTHER RESPONSIBILITIES. SECOND, THE FIRM DID NOT INVESTIGATE THE ACTIVITY THAT GENERATED CERTAIN CATEGORIES OF ALERTS BECAUSE THE FIRM UNREASONABLY CONCLUDED THAT THESE TYPES OF ALERTS DID NOT INDICATE POTENTIALLY MANIPULATIVE ACTIVITY. AS A RESULT, THE FIRM CLOSED APPROXIMATELY 67,500 OF THE 250,000 ALERTS GENERATED BY THE SYSTEM WITHOUT CONDUCTING ANY INVESTIGATION OR DOCUMENTING ANY INFORMATION ABOUT THE ALERT. THIRD, THE FIRM RELIED ON A MANUAL REVIEW OF DATA TO DETECT WHETHER ALERTS REGARDING POTENTIALLY MANIPULATIVE TRADING REFLECTED A BROADER PATTERN OF MANIPULATION BY CERTAIN TRADERS. THIS MANUAL REVIEW WAS UNREASONABLE GIVEN THE VOLUME AND COMPLEXITY OF THE TRADING BY THE FIRM'S CUSTOMERS. FINALLY, THE FIRM'S WSPS AND TRADE SURVEILLANCE PROCEDURES DID



NOT PROVIDE REASONABLE GUIDANCE AS TO FACTORS TO CONSIDER WHEN ASSESSING THE VALIDITY OF ALERTS AND DOCUMENTING THEIR DISPOSITION. AS A RESULT, THE FIRM'S REVIEW OF ALERTS WAS OFTEN CURSORY. THE FIRM ALSO REGULARLY FAILED TO REFERENCE IN ITS DOCUMENTATION INFORMATION THAT WOULD BE RELEVANT TO AN ALERT REVIEW. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED NYSE NATIONAL RULE 11.5.1. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO ESTABLISH REASONABLE MARKET ACCESS CONTROLS AND PROCEDURES. THE FIRM'S WSPS STATED THAT IT REVIEWED AND VETTED CUSTOMERS WITH ACCESS TO ITS TRADING SYSTEMS. HOWEVER, THE FIRM PERMITTED CERTAIN CUSTOMERS TO GRANT ACCESS TO THE FIRM'S ORDER MANAGEMENT SYSTEM TO HUNDREDS OF INDIVIDUAL TRADERS WITHOUT THE FIRM'S REVIEW OR PREAPPROVAL. THE ACTIVITY OF THESE CUSTOMERS GENERATED A SIGNIFICANT NUMBER OF ALERTS FOR POTENTIALLY MANIPULATIVE TRADING. THE FIRM SET CREDIT LIMITS FOR ITS CUSTOMERS BASED ONLY ON THE BUYING POWER AVAILABLE IN THE ACCOUNTS, AS REFLECTED BY THE CUSTOMER'S EXCESS FUNDS AT ACCOUNT OPENING, AND DID NOT REVIEW THOSE CREDIT LIMITS PERIODICALLY, AS REQUIRED. THE FIRM DID NOT IMPLEMENT ANY ERRONEOUS ORDER CONTROLS THAT TOOK INTO ACCOUNT THE INDIVIDUAL CHARACTERISTICS OF A SECURITY. ADDITIONALLY, THE FIRM DID NOT REVIEW THE REASONABLENESS OF ITS ERRONEOUS ORDER CONTROLS ON A REGULAR BASIS. AS A RESULT OF THE FOREGOING, THE FIRM VIOLATED EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NYSE NATIONAL RULE 11.5.1.

Initiated By: NYSE NATIONAL, INC.

Date Initiated: 08/15/2022

Docket/Case Number: 2019061702709

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 08/15/2022



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Sanctions Ordered: Censure
Monetary/Fine \$42,500.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED A TOTAL OF \$850,000, OF WHICH \$42,500 IS PAYABLE TO NYSE NATIONAL, AND REQUIRED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF ITS POLICIES, SYSTEMS, PROCEDURES (WRITTEN OR OTHERWISE) RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH EXCHANGE ACT § 15(C)(3), RULE 15C3-5(B) AND (C) THEREUNDER, AND NYSE NATIONAL RULE 11.5.1.

Reporting Source: Firm

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT FROM OCTOBER 2020 THROUGH DECEMBER 2020 THE FIRM VIOLATED NYSE NATIONAL RULE 11.5.1 BY FAILING TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH APPLICABLE SECURITIES LAWS, REGULATIONS, AND RULES PROHIBITING MANIPULATIVE TRADING. VISION ALSO VIOLATED SECTION 15(C)(3) OF THE SECURITIES EXCHANGE ACT OF 1934, RULE 15C3-5 THEREUNDER (THE "MARKET ACCESS RULE"), AND NYSE NATIONAL RULE 11.5.1, BY FAILING TO ESTABLISH, DOCUMENT, AND MAINTAIN A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES REASONABLY DESIGNED TO LIMIT THE FINANCIAL AND REGULATORY RISKS ASSOCIATED WITH PROVIDING MARKET ACCESS.

Initiated By: NYSE NATIONAL, INC.

Date Initiated: 08/15/2022

Docket/Case Number: NO. 2019061702709



Principal Product Type:	Equity Listed (Common & Preferred Stock)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	08/19/2022
Sanctions Ordered:	Monetary/Fine \$42,500.00
Other Sanctions Ordered:	
Sanction Details:	VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$42,500 TO THE NYSE NATIONAL.
Firm Statement	VFM WAS CENSURED AND ORDERED TO RETAIN AN INDEPENDENT CONSULTANT TO CONDUCT A COMPREHENSIVE REVIEW OF THE REASONABLENESS OF VISION FINANCIAL MARKETS LLC'S POLICIES, SYSTEMS, AND PROCEDURES RELATING TO THE DETECTION AND PREVENTION OF POTENTIALLY MANIPULATIVE TRADING ACTIVITY AND TO COMPLIANCE WITH RULE 15C3- 5(B) AND (C), AND NYSE NATIONAL RULE 11.5.1. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$42,500 TO NYSE NATIONAL, INC.

Disclosure 15 of 30

Reporting Source:	Firm
Current Status:	Final
Appealed To and Date Appeal Filed:	N/A
Allegations:	VFM ENTERED INTO A SETTLEMENT AGREEMENT AND WAS SUBJECT TO AN ORDER BY THE FINANCIAL AND CONSUMER AFFAIRS AUTHORITY OF SASKATCHEWAN (CANADA), BASED CONDUCT THAT OCCURRED FROM JANUARY 2013 THROUGH FEBRUARY 2014 WHEN VFM WAS AN NFA MEMBER AND FUTURES COMMISSION MERCHANT, FINDING THAT VFM ACTED CONTRARY TO THE PUBLIC INTEREST BY NOT INQUIRING INTO THE REGISTRATION STATUS IN SASKATCHEWAN OF AN INTRODUCING BROKER DESPITE KNOWINGLY ACCEPTING FUNDS FROM AND OPENING ACCOUNTS FOR VARIOUS RESIDENTS OF SASKATCHEWAN. VFM AGREED TO AND WAS ORDERED TO PAY AN ADMINISTRATIVE PENALTY OF \$25,000; TO COMPLY WITH SASKATCHEWAN SECURITIES LAWS BEFORE TRADING IN



SECURITIES OR DERIVATIVES IN SASKATCHEWAN, OR SOLICITING OR ADVERTISING OR TAKING ANY ACTION IN FURTHERANCE OF TRADES IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN AND; IF THE DIRECTOR FILES A REQUEST FOR FINANCIAL COMPENSATION (WHICH TO DATE HAS NOT OCCURRED), A SEPARATE HEARING WILL BE HELD TO DEAL WITH THE ISSUE OF FINANCIAL COMPENSATION. THE ORDER EXPLICITLY STATES THAT THE DIRECTOR HAS NOT MADE ANY ALLEGATIONS THAT VFM HAS COMMITTED ANY VIOLATIONS OF THOSE SECTIONS OF THE SASKATCHEWAN FINANCIAL AND CONSUMER AFFAIRS AUTHORITY OF SASKATCHEWAN ACT THAT PROHIBIT FRAUDULENT, MANIPULATIVE OR DECEPTIVE CONDUCT.

Initiated By:	FINANCIAL AND CONSUMER AFFAIRS AUTHORITY OF SASKATCHEWAN (CANADA)
Date Initiated:	01/31/2019
Docket/Case Number:	N/A. SEE LINK AT HTTPS://FCAA.GOV.SK. CA/PUBLIC/PLUGINS/PDFS/3443/VISION_FINANCIAL_ORDER_APPROVING_SETTLEMENT_AGREEMENT_MAY_15
Principal Product Type:	Futures - Financial
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	AGREEMENT IN THE FUTURE TO COMPLY WITH THE SASKATCHEWAN SECURITIES LAWS BEFORE TRADING IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN OR SOLICITING OR ADVERTISING OR TAKING ANY ACTION IN FURTHERANCE OF TRADES IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN.
Resolution:	Settled
Resolution Date:	05/15/2020
Sanctions Ordered:	Monetary/Fine \$15,695.00
Other Sanctions Ordered:	AGREEMENT IN THE FUTURE TO COMPLY WITH THE SASKATCHEWAN SECURITIES LAWS BEFORE TRADING IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN OR SOLICITING OR ADVERTISING OR TAKING ANY ACTION IN FURTHERANCE OF TRADES IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN
Sanction Details:	N/A
Firm Statement	VFM ENTERED INTO A SETTLEMENT AGREEMENT AND WAS SUBJECT TO AN ORDER BY THE FINANCIAL AND CONSUMER AFFAIRS AUTHORITY OF



SASKATCHEWAN (CANADA), BASED CONDUCT THAT OCCURRED FROM JANUARY 2013 THROUGH FEBRUARY 2014 WHEN VFM WAS AN NFA MEMBER AND FUTURES COMMISSION MERCHANT, FINDING THAT VFM ACTED CONTRARY TO THE PUBLIC INTEREST BY NOT INQUIRING INTO THE REGISTRATION STATUS IN SASKATCHEWAN OF AN INTRODUCING BROKER DESPITE KNOWINGLY ACCEPTING FUNDS FROM AND OPENING ACCOUNTS FOR VARIOUS RESIDENTS OF SASKATCHEWAN. VFM AGREED TO AND WAS ORDERED TO PAY AN ADMINISTRATIVE PENALTY OF \$25,000 CAD; TO COMPLY WITH SASKATCHEWAN SECURITIES LAWS BEFORE TRADING IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN, OR SOLICITING OR ADVERTISING OR TAKING ANY ACTION IN FURTHERANCE OF TRADES IN SECURITIES OR DERIVATIVES IN SASKATCHEWAN AND; IF THE DIRECTOR FILES A REQUEST FOR FINANCIAL COMPENSATION (WHICH TO DATE HAS NOT OCCURRED), A SEPARATE HEARING WILL BE HELD TO DEAL WITH THE ISSUE OF FINANCIAL COMPENSATION. THE ORDER EXPLICITLY STATES THAT THE DIRECTOR HAS NOT MADE ANY ALLEGATIONS THAT VFM HAS COMMITTED ANY VIOLATIONS OF THOSE SECTIONS OF THE SASKATCHEWAN FINANCIAL AND CONSUMER AFFAIRS AUTHORITY OF SASKATCHEWAN ACT THAT PROHIBIT FRAUDULENT, MANIPULATIVE OR DECEPTIVE CONDUCT.

Disclosure 16 of 30

Reporting Source: Regulator

Current Status: Final

Allegations: ON JULY 12, 2019, THE COMMODITY FUTURES TRADING COMMISSION ISSUED AN ORDER INSTITUTING PROCEEDINGS PURSUANT TO SECTIONS 6(C) AND 6(D) OF THE COMMODITY EXCHANGE ACT, MAKING FINDINGS AND IMPOSING REMEDIAL SANCTIONS AGAINST RESPONDENT VISION FINANCIAL MARKETS LLC. THE CFTC HAS REASON TO BELIEVE THAT VISION FINANCIAL MARKETS LLC VIOLATED COMMISSION REGULATION 166.3. THEREFORE, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED TO DETERMINE WHETHER RESPONDENT ENGAGED IN THE VIOLATIONS SET FORTH HEREIN AND TO DETERMINE WHETHER ANY ORDER SHOULD BE ISSUED IMPOSING REMEDIAL SANCTIONS. IN ANTICIPATION OF THE INSTITUTION OF AN ADMINISTRATIVE PROCEEDING, RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT, WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OR CONCLUSIONS HEREIN, RESPONDENT CONSENTS TO THE ENTRY OF THIS ORDER INSTITUTING PROCEEDINGS PURSUANT TO SECTION 6(C) AND (D) OF THE COMMODITY EXCHANGE ACT, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND ACKNOWLEDGES SERVICE OF THIS ORDER.



THE COMMISSION FINDS THE FOLLOWING: FROM AT LEAST JANUARY 1 TO NOVEMBER 30, 2014, RESPONDENT, A THEN-REGISTERED FUTURES COMMISSION MERCHANT ("FCM"), FAILED TO DILIGENTLY SUPERVISE THE HANDLING BY ITS EMPLOYEES AND AGENTS OF COMMODITY INTEREST ACCOUNTS CARRIED BY RESPONDENT AND INTRODUCED BY A RESPONDENT GUARANTEED INTRODUCING BROKER ("GIB"), AS WELL AS THE ACTIVITIES OF ITS EMPLOYEES AND AGENTS RELATING TO ITS BUSINESS AS A THEN-REGISTERED FCM TO ENSURE COMPLIANCE WITH THE ACT AND REGULATIONS, AND TO DETER AND DETECT WRONGDOING, IN VIOLATION OF REGULATION 166.3. IN PARTICULAR, RESPONDENT HAD A SUPERVISORY SYSTEM IN PLACE AS EVIDENCED BY ITS COMPLIANCE MANUAL; NEVERTHELESS, RESPONDENT FAILED TO ADEQUATELY SUPERVISE ITS EMPLOYEES AND AGENTS TO ENSURE THEY: (1) EXECUTED BUNCHED ORDERS THAT PROPERLY SEGREGATED THE GIB'S PROPRIETARY TRADES FROM ITS CUSTOMER TRADES; (2) EXECUTED BUNCHED ORDERS THAT PROPERLY SEGREGATED TRADES FROM DISCRETIONARY AND NON-DISCRETIONARY GIB CUSTOMER ACCOUNTS; AND (3) EXECUTED ORDERS FOR NON-DISCRETIONARY GIB CUSTOMERS ONLY WHEN THE GIB HAD OBTAINED SPECIFIC CUSTOMER AUTHORIZATION FOR THE TRANSACTION.

Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	07/12/2019
Docket/Case Number:	19-13
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Order
Resolution Date:	07/12/2019
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 \$200,000.00 Cease and Desist/Injunction



Other Sanctions Ordered: ORDERED TO COMPLY WITH CONDITIONS AND UNDERTAKINGS

Sanction Details: IN ACCEPTING RESPONDENT'S OFFER OF SETTLEMENT, THE COMMISSION RECOGNIZES RESPONDENT'S COOPERATION DURING THE DIVISION OF ENFORCEMENT'S INVESTIGATION OF THIS MATTER. BASED ON THE FOREGOING, THE COMMISSION FINDS THAT, DURING THE RELEVANT PERIOD, RESPONDENT VIOLATED REGULATION 166.3. RESPONDENT HAS SUBMITTED THE OFFER IN WHICH IT, WITHOUT ADMITTING OR DENYING THE FINDINGS AND CONCLUSIONS HEREIN, CONSENTS, SOLELY ON THE BASIS OF THE OFFER, TO THE COMMISSION'S ENTRY OF THIS ORDER. ACCORDINGLY, IT IS HEREBY ORDERED THAT: RESPONDENT SHALL CEASE AND DESIST FROM VIOLATING REGULATION 166.3; RESPONDENT SHALL PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$200,000 (CMP OBLIGATION), PLUS POST-JUDGMENT INTEREST; AND RESPONDENT SHALL COMPLY WITH THE FOLLOWING CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER.

Reporting Source: Firm

Current Status: Final

Allegations: THE ACTION ALLEGES FROM AT LEAST JANUARY 1, 2014, TO NOVEMBER 30, 2014, VISION, A THEN-REGISTERED FCM, FAILED TO SUPERVISE THE HANDLING OF COMMODITY INTEREST ACCOUNTS CARRIED BY VISION AND INTRODUCED BY A VISION-GUARANTEED INTRODUCING BROKER (GIB).

Initiated By: COMMODITY FUTURES TRADING COMMISSION

Date Initiated: 07/12/2019

Docket/Case Number: 19-13

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Cease and Desist

Other Sanction(s)/Relief Sought: CIVIL MONETARY PENALTY

Resolution: Other

Resolution Date: 07/12/2019

Sanctions Ordered: Monetary/Fine \$200,000.00
Cease and Desist/Injunction

**Other Sanctions Ordered:****Sanction Details:** NONE**Firm Statement** THE ORDER REQUIRES VISION TO PAY A CIVIL MONETARY PENALTY OF \$200,000 AND CEASE AND DESIST FROM ANY FURTHER VIOLATIONS OF THE COMMODITY EXCHANGE ACT OR CFTC REGULATIONS.**Disclosure 17 of 30****Reporting Source:** Regulator**Current Status:** Final**Allegations:** NOTICE OF FINES FOR MINOR RULE PLAN VIOLATIONS: THE FIRM FAILED TO ENFORCE ITS WRITTEN SUPERVISORY PROCEDURES REQUIRING ITS ASSOCIATED PERSONS TO BE REGISTERED WITH ALL APPLICABLE EXCHANGES, INCLUDING NYSE ARCA. THE VIOLATIVE CONDUCT OCCURRED DURING THE PERIOD OF JULY 29, 2015 THROUGH SEPTEMBER 14, 2017.**Initiated By:** NYSE ARCA, INC.**Date Initiated:** 04/09/2019**Docket/Case Number:** 2017052406201**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Other**Other Sanction(s)/Relief Sought:** N/A**Resolution:** Other**Resolution Date:** 04/16/2019**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 \$3,500.00**Other Sanctions Ordered:****Sanction Details:** THE FIRM WAS FINED \$3,500.00.



THE IMPOSITION OF THIS FINE SHALL BECOME FINAL AND THE FINE SPECIFIED ABOVE SHALL BECOME DUE AND PAYABLE TO THE EXCHANGE FIVE BUSINESS DAYS AFTER THE DATE OF YOUR RECEIPT OF THIS NOTICE. THEREFORE, THIS ACTION BECAME FINAL APRIL 16, 2019. BECAUSE ONE OR MORE OF THE INDIVIDUAL FINE(S) BEING IMPOSED EXCEEDS \$2,500, SUCH FINE(S) IS REQUIRED TO BE REPORTED BY THE FIRM ON THE FORM BD. A FAILURE TO REPORT SUCH FINE(S) ON THE FORM BD COULD SUBJECT THE FIRM TO FURTHER DISCIPLINARY ACTION. MOREOVER, SUCH FINE(S) WILL ALSO BE REPORTED BY NYSE ARCA, NYSE REGULATION AND/OR FINRA TO THE SECURITIES AND EXCHANGE COMMISSION UNDER RULE 19D-1 OF THE SECURITIES EXCHANGE ACT OF 1934. PLEASE ALSO BE ADVISED THAT ANY VIOLATION THAT IS CONTESTED BE ALSO REQUIRED TO BE REPORTED BY THE FIRM ON THE FORM BD.

Reporting Source:	Firm
Current Status:	Final
Allegations:	NOTICE OF FINES FOR MINOR RULE PLAN VIOLATIONS: THE FIRM FAILED TO ENFORCE ITS WRITTEN SUPERVISORY PROCEDURES REQUIRING ITS ASSOCIATED PERSONS TO BE REGISTERED WITH ALL APPLICABLE EXCHANGES, INCLUDING NYSE ARCA. THE VIOLATIVE CONDUCT OCCURRED DURING THE PERIOD OF JULY 29, 2015 THROUGH SEPTEMBER 14, 2017.
Initiated By:	NYSE ARCA, INC.
Date Initiated:	04/09/2019
Docket/Case Number:	2017052406201
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	N/A
Resolution:	Other
Resolution Date:	04/16/2019
Sanctions Ordered:	Monetary/Fine \$3,500.00

**Other Sanctions Ordered:**

Sanction Details: THE FIRM WAS FINED \$3,500.00.

Disclosure 18 of 30

Reporting Source: Regulator

Current Status: Final

Allegations: SEC ADMIN RELEASE 34-85460 / MARCH 29, 2019:
THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED PURSUANT TO SECTIONS 15(B), AND 21C OF THE SECURITIES EXCHANGE ACT OF 1934 ("EXCHANGE ACT") AGAINST VISION FINANCIAL MARKETS LLC ("VFM").
THE COMMISSION FINDS THAT THIS MATTER CONCERNS THE FAILURE BY VFM, A REGISTERED BROKER-DEALER, TO FILE SUSPICIOUS ACTIVITY REPORTS ("SAR" OR "SARS") FOR VOLUMINOUS SUSPICIOUS ACTIVITY RELATING TO THE DEPOSIT AND SALE OF LOW-PRICED SECURITIES FROM AT LEAST AUGUST 2013 THROUGH DECEMBER 2014 (THE "RELEVANT PERIOD"). IN LATE 2012, VFM EXPANDED ITS BUSINESS OF CLEARING EQUITY SECURITIES BY ENTERING INTO CLEARING ARRANGEMENTS WITH SEVERAL NEW INTRODUCING BROKERS. DURING THE RELEVANT PERIOD, VFM CLEARED MILLIONS OF SHARES OF TRANSACTIONS IN LOW-PRICED SECURITIES ON BEHALF OF CERTAIN CUSTOMERS OF CERTAIN OF ITS NEW INTRODUCING BROKERS. THESE TRADES INCLUDED INSTANCES IN WHICH NEWLY INTRODUCED CUSTOMER ACCOUNTS EXHIBITED A SUSPICIOUS PATTERN IN WHICH THE CUSTOMER DEPOSITED A PHYSICAL CERTIFICATE FOR A SUBSTANTIAL AMOUNT OF A THINLY-TRADED LOW-PRICED STOCK, SYSTEMATICALLY SOLD THE SHARES INTO THE MARKET SHORTLY THEREAFTER, AND THEN WIRED OUT THE SALE PROCEEDS FROM ITS ACCOUNTS. IN SOME INSTANCES, THE SAME CUSTOMER ENGAGED IN THIS PATTERN WITH RESPECT TO MULTIPLE SECURITIES. DESPITE CLEARING THESE SUSPICIOUS TRANSACTIONS AND OTHER RELATED RED FLAGS, VFM DID NOT FILE TIMELY SARS RELATED TO RELEVANT ACTIVITIES BY AT LEAST 100 OF THESE ACCOUNTS WHEN IT KNEW, SUSPECTED, OR HAD REASON TO SUSPECT THAT THESE TRANSACTIONS INVOLVED THE USE OF VFM TO FACILITATE FRAUDULENT ACTIVITY, OR HAD NO BUSINESS OR APPARENT LAWFUL PURPOSE. AS A RESULT OF THIS CONDUCT, VFM WILLFULLY VIOLATED SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-8 THEREUNDER.

Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Date Initiated: 03/29/2019



Docket/Case Number:	3-19125
Principal Product Type:	Penny Stock(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	03/29/2019
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 \$625,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	VFM WAS CENSURED AND ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-8 THEREUNDER. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$625,000 TO THE SECURITIES AND EXCHANGE COMMISSION.
Regulator Statement	RESPONDENT HAS SUBMITTED AN OFFER OF SETTLEMENT (THE "OFFER") WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. VFM WILLFULLY VIOLATED SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-8 THEREUNDER. IT IS ORDERED THAT VFM IS CENSURED AND SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-8 THEREUNDER. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$625,000 TO THE SECURITIES AND EXCHANGE COMMISSION.

Reporting Source:	Firm
Current Status:	Final



Allegations:	ACCORDING TO THE SEC'S ORDER, FROM AUGUST 2013 THROUGH DECEMBER 2014, VISION FINANCIAL MARKETS LLC CLEARED FOR SALE A SIGNIFICANT NUMBER OF PENNY STOCK TRANSACTIONS FOR CUSTOMERS OF ITS INTRODUCING BROKERS HAVING INDICATIONS OF SUSPICIOUS TRADING ACTIVITY. THE SEC'S ORDER FOUND THAT IN MORE THAN 250 INSTANCES OF SUSPICIOUS TRADING PATTERNS INVOLVING AT LEAST 101 CUSTOMER ACCOUNTS, CUSTOMERS DEPOSITED BLOCKS OF PENNY STOCK, SOLD THE SHARES INTO THE MARKET SHORTLY THEREAFTER AND WIRED OUT THE PROCEEDS. ACCORDING TO THE ORDER, VISION FAILED TO FILE SARS WITH RESPECT TO THESE SUSPICIOUS TRANSACTIONS. WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION AGREED TO A SETTLEMENT THAT IMPOSES A \$625,000 PENALTY, A CENSURE, AND AN ORDER TO CEASE AND DESIST FROM SIMILAR VIOLATIONS IN THE FUTURE.
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Date Initiated:	03/29/2019
Docket/Case Number:	3-19125
Principal Product Type:	Penny Stock(s)
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CENSURE
Resolution:	Order
Resolution Date:	03/29/2019
Sanctions Ordered:	Censure Monetary/Fine \$625,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	
Sanction Details:	VFM WAS CENSURED AND ORDERED TO CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION 17(A) OF THE EXCHANGE ACT AND RULE 17A-8 THEREUNDER. VFM SHALL PAY A CIVIL MONEY PENALTY IN THE AMOUNT OF \$625,000 TO THE SECURITIES AND EXCHANGE COMMISSION.

Disclosure 19 of 30

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 IT REPORTED INACCURATE SHORT INTEREST POSITIONS TO FINRA. THE FINDINGS STATED THAT THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RESPECT TO THE APPLICABLE SECURITIES LAWS AND REGULATIONS, AND FINRA RULES, CONCERNING SHORT INTEREST REPORTING.
Initiated By:	FINRA
Date Initiated:	04/19/2017
Docket/Case Number:	2013039143101
Principal Product Type:	Other
Other Product Type(s):	UNSPECIFIED SECURITIES
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/19/2017
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 WAS CENSURED AND FINED \$20,000. FINES PAID IN FULL ON 5/4/17.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT REPORTED



INACCURATE SHORT INTEREST POSITIONS TO FINRA. THE FINDINGS STATED THAT THE FIRM'S SUPERVISORY SYSTEM DID NOT PROVIDE FOR SUPERVISION REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH RESPECT TO THE APPLICABLE SECURITIES LAWS AND REGULATIONS, AND FINRA RULES, CONCERNING SHORT INTEREST REPORTING.

Initiated By: FINRA

Date Initiated: 04/19/2017

Docket/Case Number: [2013039143101](#)

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 04/19/2017

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$20,000.

Disclosure 20 of 30

Reporting Source: Regulator

Current Status: Final

Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION FINANCIAL MARKETS LLC CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT SUBMITTED 574 INACCURATE BLUE SHEETS TO FINRA AND THE SEC THAT MISREPORTED AT LEAST 17,014 TRANSACTIONS. THE FINDINGS STATED THAT VISION'S BLUE SHEETS ERRONEOUSLY REPORTED SOME "BUYS" AS "CANCELLED BUYS" AND SOME "SELLS" AS "CANCELLED SELLS"; ERRONEOUSLY REPORTED SOME TRANSACTIONS WITH ZERO QUANTITIES; AND FAILED TO REPORT SOME OPTIONS TRANSACTIONS. THE FINDINGS ALSO STATED THAT VISION DID NOT HAVE IN PLACE AN ADEQUATE AUDIT SYSTEM PROVIDING FOR ACCOUNTABILITY REGARDING THE INPUTTING OF RECORDS REQUIRED TO BE MAINTAINED AND PRESERVED.



Initiated By:	FINRA
Date Initiated:	02/24/2017
Docket/Case Number:	2014042060201
Principal Product Type:	Other
Other Product Type(s):	BLUE SHEETS
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	02/24/2017
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 \$50,000.00
Other Sanctions Ordered:	UNDERTAKING
Sanction Details:	THE FIRM WAS CENSURED, FINED \$50,000, AND AGREED TO CONDUCT A REVIEW OF ITS POLICIES, SYSTEMS, AND PROCEDURES RELATING TO ITS COMPILATION AND SUBMISSION OF BLUE SHEET DATA AND ITS AUDIT DEFICIENCIES. FINE PAID IN FULL ON 3/7/17.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	WITHOUT ADMITTING OR DENYING THE FINDINGS, VISION FINANCIAL MARKETS LLC CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT SUBMITTED 574 INACCURATE BLUE SHEETS TO FINRA AND THE SEC THAT MISREPORTED AT LEAST 17,014 TRANSACTIONS. THE FINDINGS STATED THAT VISION'S BLUE SHEETS ERRONEOUSLY REPORTED SOME "BUYS" AS "CANCELLED BUYS" AND SOME "SELLS" AS "CANCELLED SELLS"; ERRONEOUSLY REPORTED SOME TRANSACTIONS WITH ZERO QUANTITIES; AND FAILED TO REPORT SOME OPTIONS TRANSACTIONS. THE FINDINGS ALSO STATED THAT VISION DID NOT HAVE



IN PLACE AN ADEQUATE AUDIT SYSTEM PROVIDING FOR ACCOUNTABILITY REGARDING THE INPUTTING OF RECORDS REQUIRED TO BE MAINTAINED AND PRESERVED.

Initiated By: FINRA

Date Initiated: 02/24/2017

Docket/Case Number: [2014042060201](#)

Principal Product Type: Other

Other Product Type(s): BLUESHEETS

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 02/24/2017

Sanctions Ordered: Censure
Monetary/Fine \$50,000.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED, FINED \$50,000, AND AGREED TO CONDUCT A REVIEW OF ITS POLICIES, SYSTEMS, AND PROCEDURES RELATING TO ITS COMPILATION AND SUBMISSION OF BLUE SHEET DATA AND ITS AUDIT DEFICIENCIES.

Disclosure 21 of 30

Reporting Source: Regulator

Current Status: Final

Allegations: VISION FINANCIAL MARKETS LLC ("VISION"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED \$40,000. IN ADDITION, THE COMMITTEE ORDERED AN UNDERTAKING WHEREBY VISION SHALL BE REQUIRED TO ENHANCE ITS WRITTEN SUPERVISORY PROCEDURES RELATING TO COMPLIANCE WITH REGULATION SHO, AND SHALL BE REQUIRED TO SUBMIT ITS ENHANCED WRITTEN SUPERVISORY PROCEDURES TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), THAT SHALL BE ACCEPTABLE TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), WITHIN THIRTY (30) DAYS OF THE ISSUANCE OF THE DECISION IN THIS MATTER. VISION: (I) FAILED TO COMPLY WITH THE CLOSE-OUT REQUIREMENT FOR 14 OF THE 53 SAMPLED FAILED TO



DELIVER SECURITY POSITIONS; (II) IMPROPERLY MARKED 101 OUT OF 199 SAMPLED SELL ORDERS; (III) FAILED TO PERFORM A LOCATE FOR EIGHT (8) OF 47 SAMPLED SHORT SALE ORDERS; (IV) MARKED 47 SALE ORDERS AS SHORT EXEMPT WHEN THESE ORDERS DID NOT QUALIFY FOR THE SHORT EXEMPT ORDER MARKING DESIGNATION; AND (V) FAILED TO ADEQUATELY SUPERVISE ITS COMPLIANCE WITH THE REQUIREMENTS OF REGULATION SHO. (EXCHANGE RULES 4.2 - ADHERENCE TO LAW AND 15.1 - MAINTENANCE, RETENTION AND FURNISHING OF BOOKS, RECORDS AND OTHER INFORMATION; SECTION 17(A) OF THE SECURITIES EXCHANGE ACT OF 1934, AS AMENDED (THE "EXCHANGE ACT") AND RULE 17A-3 - RECORDS TO BE MADE BY CERTAIN EXCHANGE MEMBERS, BROKERS AND DEALERS THEREUNDER; AND REGULATION SHO RULES 200 - DEFINITION OF "SHORT SALE" AND MARKING REQUIREMENTS, 201 - CIRCUIT BREAKER, 203 - BORROWING AND DELIVERY REQUIREMENTS, AND 204 - CLOSE-OUT REQUIREMENT PROMULGATED UNDER THE EXCHANGE ACT)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 09/11/2015

Docket/Case Number: 15-0059/ 20150454599

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: 10/20/2015

Sanctions Ordered: Censure
Monetary/Fine \$40,000.00

Other Sanctions Ordered: AN UNDERTAKING WHEREBY VISION SHALL BE REQUIRED TO ENHANCE ITS WRITTEN SUPERVISORY PROCEDURES RELATING TO COMPLIANCE WITH REGULATION SHO, AND SHALL BE REQUIRED TO SUBMIT ITS ENHANCED WRITTEN SUPERVISORY PROCEDURES TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), THAT SHALL BE ACCEPTABLE TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), WITHIN THIRTY (30) DAYS OF THE ISSUANCE OF THE DECISION IN THIS MATTER.

Sanction Details: A \$40,000 FINE, A CENSURE AND AN UNDERTAKING WHEREBY VISION SHALL BE REQUIRED TO ENHANCE ITS WRITTEN SUPERVISORY PROCEDURES RELATING TO COMPLIANCE WITH REGULATION SHO, AND SHALL BE REQUIRED TO SUBMIT ITS ENHANCED WRITTEN SUPERVISORY



PROCEDURES TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), THAT SHALL BE ACCEPTABLE TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), WITHIN THIRTY (30) DAYS OF THE ISSUANCE OF THE DECISION IN THIS MATTER.

Reporting Source: Firm

Current Status: Final

Allegations: IN OR ABOUT AUGUST 2013, VISION FAILED TO COMPLY WITH THE CLOSE-OUT REQUIREMENT FOR 14 OF 53 SAMPLED FAILED TO DELIVER POSITIONS, OR APPROXIMATELY 26%. IN OR ABOUT AUGUST 2013, VISION IMPROPERLY MARKED 101 OUT OF 199 SAMPLED SELL ORDERS, OR APPROXIMATELY 51%. SPECIFICALLY, 99 OF THE IMPROPERLY MARKED ORDERS WERE MARKED LONG WHEN THEY SHOULD HAVE BEEN MARKED SHORT AND TWO HAD NO SHORT OR LONG MARKING WHEN THEY SHOULD HAVE BEEN MARKED SHORT. IN OR ABOUT AUGUST 2013, THE FIRM FAILED TO PERFORM A LOCATE FOR 8 OF 47 SAMPLED SHORT SALE ORDERS, OR APPROXIMATELY 17%. IN OR ABOUT AUGUST 2013, THE FIRM IMPROPERLY MARKED 47 SALE ORDERS AS A SHORT EXEMPT. IN OR ABOUT AUGUST 2013, THE FIRM FAILED TO ADEQUATELY SUPERVISE IT COMPLIANCE WITH THE REQUIREMENTS OF REGULATION SHO.

Initiated By: FINRA

Date Initiated: 09/11/2015

Docket/Case Number: 15-0059/ 20150454599

Principal Product Type: Other

Other Product Type(s): SHORT SALES

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought: FINE AND UNDERTAKING WHEREBY VISION FINANCIAL MARKETS LLC SHALL BE REQUIRED TO ENHANCE ITS WSP RELATING TO COMPLIANCE WITH REGULATION SHO AND SHALL BE REQUIRED TO SUBMIT ITS ENHANCED WSP TO FINRA MARKET REGULATION DEPARTMENT, THAT SHALL BE ACCEPTABLE TO FINRA'S MARKET REGULATION DEPARTMENT, WITHIN 30 DAYS OF THE ISSUANCE OF THE DECISION IN THIS MATTER.

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 10/20/2015

Sanctions Ordered: Censure



Monetary/Fine \$40,000.00

Other Sanctions Ordered: AN UNDERTAKING WHEREBY VISION SHALL BE REQUIRED TO ENHANCE ITS WRITTEN SUPERVISORY PROCEDURES RELATING TO COMPLIANCE WITH REGULATION SHO, AND SHALL BE REQUIRED TO SUBMIT ITS ENHANCED WRITTEN SUPERVISORY PROCEDURES TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), THAT SHALL BE ACCEPTABLE TO FINRA'S MARKET REGULATION DEPARTMENT (LEGAL), WITHIN THIRTY (30) DAYS OF THE ISSUANCE OF THE DECISION IN THIS MATTER.

Sanction Details: FINE OF \$40,000. LEVIED AGAINST VISION FINANCIAL MARKETS LLC. PAID ON OCTOBER 30, 2015.

Disclosure 22 of 30

Reporting Source: Firm

Current Status: Final

Allegations: CBOE ALLEGES THAT VISION FAILED TO REGISTERED 4 ASSOCIATED PERSONS AS PROPRIETARY TRADERS.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE "CBOE"

Date Initiated: 08/01/2014

Docket/Case Number: FILE NO. 14-0119

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 09/08/2014

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered: VISION WILL ENHANCE ITS RISK CONTROLS AND PROCEDURES RELATING DIRECT MARKET ACCESS.

Sanction Details: NONE

Firm Statement THIS WAS A JOINT SETTLEMENT FOR BOTH 14-0029 AND 14-0019. THERE WAS ONE FINE FOR THE TWO CITATIONS.



Disclosure 23 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	VISION FINANCIAL MARKETS, LLC ("VISION"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED \$20,000 FOR THE FOLLOWING CONDUCT. IN ADDITION, AN UNDERTAKING WAS ORDERED, REQUIRING VISION TO ENHANCE ITS RISK CONTROLS AND PROCEDURES RELATING TO MARKET ACCESS. VISION (I) FAILED TO REGISTER FOUR ASSOCIATED PERSONS AS A PROPRIETARY TRADER PRINCIPAL (TP) WITH THE EXCHANGE IN WEBCRD; AND (II) FAILED TO ESTABLISH, DOCUMENT, AND MAINTAIN A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES REASONABLY DESIGNED TO MANAGE THE FINANCIAL, REGULATORY, AND OTHER RISKS OF THE FIRM'S BUSINESS ACTIVITY. (EXCHANGE RULES 3.6A - QUALIFICATION AND REGISTRATION OF TRADING PERMIT HOLDERS AND ASSOCIATED PERSONS, 4.2 - ADHERENCE TO LAW; AND RULE 15C3-5 - RISK MANAGEMENT CONTROLS FOR BROKERS OR DEALERS WITH MARKET ACCESS UNDER THE SECURITIES AND EXCHANGE ACT OF 1934, AS AMENDED)
Initiated By:	CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated:	04/29/2014
Docket/Case Number:	14-0029 AND 14-0119
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:	09/08/2014
Sanctions Ordered:	Censure Monetary/Fine \$20,000.00
Other Sanctions Ordered:	
Sanction Details:	IN ADDITION, AN UNDERTAKING WAS ORDERED, REQUIRING VISION TO ENHANCE ITS RISK CONTROLS AND PROCEDURES RELATING TO MARKET ACCESS. VISION SHALL BE REQUIRED TO SUBMIT ITS ENHANCED



PROCEDURES TO THE EXCHANGE'S DEPARTMENT OF EQUITY TRADING
REGULATION AND THE OFFICE OF ENFORCEMENT WITHIN THIRTY (30)
DAYS OF THE ISSUANCE OF THE DECISION IN THIS MATTER.

Reporting Source: Firm

Current Status: Final

Allegations: THE BUSINESS CONDUCT COMMITTEE OF THE CHICAGO BOARD OPTIONS EXCHANGE ("CBOE") ALLEGES THAT FROM ON OR ABOUT JULY, 2011 TO SEPTEMBER 2013, VISION FINANCIAL MARKETS LLC ("VISION") FAILED TO ESTABLISH, DOCUMENT AND MAINTAIN A SYSTEM OF RISK MANAGEMENT CONTROLS AND SUPERVISORY PROCEDURES REASONABLY DESIGNED TO MANAGE THE FINANCIAL REGULATORY AND OTHER RISKS OF DIRECT MARKET ACCESS ACTIVITY ("DMA") IN VIOLATION OF CBOE RULE 4.2 AND SEC RULE 15C3-5. PRIOR TO THE STATEMENT OF CHARGES, VISION SUBMITTED TO THE CBOE A LETTER DESCRIBING THE LIMITED DMA ACTIVITY IT CONDUCTS, THE FINANCIAL AND RISK CONTROLS IT DOES MAINTAIN OVER SUCH ACTIVITY AND CERTAIN IMPROVEMENTS THAT IT HAS AGREED TO ADOPT.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE ("CBOE")

Date Initiated: 04/29/2014

Docket/Case Number: 14-0029

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 09/08/2014

Sanctions Ordered: Censure
Monetary/Fine \$20,000.00

Other Sanctions Ordered: VISION IS REQUIRED TO ENHANCE ITS RISK CONTROLS AND PROCEDURES RELATING TO MARKET ACCESS.

Sanction Details: NONE

Firm Statement THIS WAS A JOINT SETTLEMENT FOR BOTH 14-0029 AND 14-0019. THERE WAS ONE FINE FOR THE TWO CITATIONS.

Disclosure 24 of 30

Reporting Source: Regulator

Current Status: Final

Allegations: CFTC PRESS RELEASE 6714-13, SEPTEMBER 27, 2013: THE COMMODITY FUTURES TRADING COMMISSION ("COMMISSION") HAD REASON TO BELIEVE THAT FROM IN OR ABOUT AUGUST 2008 TO AT LEAST JUNE 2009 (THE "RELEVANT PERIOD"), VISION FINANCIAL MARKETS LLC ("VISION" OR "RESPONDENT") VIOLATED SECTION 4D(A)(2) OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 6D(A)(2), AND COMMISSION REGULATIONS ("REGULATIONS") 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26, 17 C.F.R. §§ 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26. THEREFORE, THE COMMISSION DEEMED IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED TO DETERMINE WHETHER VISION ENGAGED IN THE VIOLATIONS AND TO DETERMINE WHETHER ANY ORDER SHOULD BE ISSUED IMPOSING REMEDIAL SANCTIONS.

THE COMMISSION FOUND THAT VISION, REGISTERED WITH THE COMMISSION AS A FUTURES COMMISSION MERCHANT ("FCM") AND WITH THE SECURITIES AND EXCHANGE COMMISSION ("SEC") AS A BROKER-DEALER ("BD"), VIOLATED THE COMMODITY EXCHANGE ACT AND COMMISSION REGULATIONS BY BEING AN FCM THAT FAILED TO SEGREGATE COMMODITY FUTURES AND OPTIONS CUSTOMERS' FUNDS. VISION, AFTER USING COMMODITY FUTURES AND OPTIONS CUSTOMER FUNDS TO PURCHASE SECURITIES, FAILED TO ACCOUNT FOR AND HOLD THOSE SECURITIES SEPARATELY FOR ITS CUSTOMERS. INSTEAD, VISION COMMINGLED THE SECURITIES WITH ITS OWN FUNDS AND THE FUNDS OF ITS SECURITIES CUSTOMERS IN VISION'S PARTICIPANT ACCOUNT HELD IN ITS OWN NAME AT THE DEPOSITORY TRUST COMPANY ("DTC"). AS SUCH, VISION FAILED TO COMPLY WITH REQUIREMENTS FOR HOLDING AND SEGREGATING CUSTOMER FUNDS AS SET FORTH IN SECTION 4D(A)(2) OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 6D(A)(2), AND REGULATIONS 1.20 AND 1.26, 17 C.F.R. §§ 1.20 AND 1.26.

VISION'S VIOLATIONS OF FCM SEGREGATION REQUIREMENTS WENT UNDETECTED DURING THE RELEVANT PERIOD BECAUSE VISION DID NOT REPORT TO ITS DESIGNATED SELF-REGULATORY ORGANIZATION ("DSRO") OR THE COMMISSION THAT THE AMOUNT ON DEPOSIT IN SEGREGATED ACCOUNTS WAS LESS THAN THE TOTAL AMOUNT REQUIRED BY THE COMMODITY EXCHANGE ACT AND MISSTATED IN MONTHLY SEGREGATION STATEMENTS FILED WITH THE COMMISSION THE



LOCATION AND MANNER IN WHICH THE CUSTOMER FUNDS WERE BEING HELD. VISION REPRESENTED TO THE COMMISSION THAT THE CUSTOMER FUNDS WERE "DEPOSITED IN SEGREGATED FUNDS BANK ACCOUNTS," WHEN, IN FACT, CERTAIN VISION PERSONNEL INVOLVED WITH PREPARING AND SUBMITTING THE MONTHLY SEGREGATION STATEMENTS KNEW THAT THE ASSETS WERE NOT HELD AT A BANK BUT ACTUALLY WERE HELD IN VISION'S ACCOUNT AT DTC, WHICH INCLUDED FUNDS OF VISION AND OTHERS. VISION'S FAILURE TO NOTIFY ITS DSRO AND THE COMMISSION AND ITS MISSTATEMENTS VIOLATED REGULATIONS 1.10(D)(1)(V) AND (VI) AND 1.12(H), 17 C.F.R. §§ 1.10(D)(1)(V) AND (VI) AND 1.12(H).

VISION'S SEGREGATION VIOLATIONS AND MISSTATEMENTS WERE UNCOVERED IN JUNE 2009 DURING A REGULATORY EXAMINATION BY VISION'S DSRO, AFTER WHICH VISION WAS INFORMED OF THE SEGREGATION VIOLATIONS. VISION THEREAFTER RESTATED ITS MONTHLY SEGREGATION STATEMENTS, DEDUCTING THE VALUE OF THE CUSTOMER FUNDS HELD IN THE DTC ACCOUNT FROM ITS CALCULATION OF TOTAL SEGREGATED FUNDS. FROM AUGUST 2008 THROUGH NOVEMBER 2008, DEDUCTING THE VALUE OF THESE FUNDS FROM VISION'S TOTAL FUNDS IN SEGREGATION DID NOT CAUSE THE FIRM TO BE UNDER-SEGREGATED BECAUSE VISION HAD ENOUGH EXCESS IN SEGREGATION TO MEET ITS REGULATORY REQUIREMENT. HOWEVER, FROM DECEMBER 2008 THROUGH MAY 2009, WHEN VISION HAD INVESTED LARGER AMOUNTS OF CUSTOMER FUNDS IN SECURITIES, EXCLUDING THEIR VALUE FROM VISION'S CALCULATION OF TOTAL FUNDS IN SEGREGATION PUT VISION IN A POSITION OF UNDER-SEGREGATION FOR THE ENTIRE SIX (6) MONTH PERIOD. PRIOR TO THE CME'S EXAMINATION AND THROUGHOUT THE RELEVANT PERIOD, VISION DID NOT NOTIFY ITS DSRO OR THE CFTC THAT IT WAS UNDER-SEGREGATED.

Initiated By: COMMODITY FUTURES TRADING COMMISSION

Date Initiated: 09/27/2013

Docket/Case Number: 13-39

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Order



Resolution Date:	09/27/2013
Sanctions Ordered:	Monetary/Fine \$525,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	POST-JUDGMENT INTEREST
Sanction Details:	ACCORDINGLY, IT IS HEREBY ORDERED THAT VISION AND ITS SUCCESSORS AND ASSIGNS SHALL CEASE AND DESIST FROM VIOLATING SECTION 4D(A)(2) OF THE ACT, 7 U.S.C. § 6D(A)(2), AND COMMISSION REGULATIONS 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26, 17 C.F.R. §§ 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26. VISION SHALL PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$525,000, PLUS POST-JUDGMENT INTEREST WITHIN TEN (10) BUSINESS DAYS OF THE DATE OF ENTRY OF THE ORDER. VISION AND ITS SUCCESSORS AND ASSIGNS SHALL COMPLY WITH THE CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER.
Regulator Statement	IN ANTICIPATION OF THE INSTITUTION OF AN ADMINISTRATIVE PROCEEDING, VISION SUBMITTED AN OFFER OF SETTLEMENT ("OFFER"), WHICH THE COMMISSION DETERMINED TO ACCEPT. WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OR CONCLUSIONS, VISION CONSENTED TO THE ENTRY OF THE ORDER INSTITUTING PROCEEDINGS PURSUANT TO SECTIONS 6(C) AND 6(D) OF THE COMMODITY EXCHANGE ACT, MAKING FINDINGS AND IMPOSING REMEDIAL SANCTIONS ("ORDER") AND ACKNOWLEDGED SERVICE OF THE ORDER. THE COMMISSION HAS DETERMINED TO ACCEPT THE OFFER.

Reporting Source:	Firm
Current Status:	Final
Allegations:	CFTC PRESS RELEASE 6714-13, SEPTEMBER 27, 2013: THE COMMODITY FUTURES TRADING COMMISSION ("COMMISSION") HAD REASON TO BELIEVE THAT FROM IN OR ABOUT AUGUST 2008 TO AT LEAST JUNE 2009 (THE "RELEVANT PERIOD"), VISION FINANCIAL MARKETS LLC ("VISION" OR "RESPONDENT") VIOLATED SECTION 4D(A)(2) OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. § 6D(A)(2), AND COMMISSION REGULATIONS ("REGULATIONS") 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26, 17 C.F.R. §§ 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26. THEREFORE, THE COMMISSION DEEMED IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED TO DETERMINE WHETHER VISION ENGAGED IN THE VIOLATIONS AND TO DETERMINE WHETHER ANY ORDER SHOULD BE ISSUED IMPOSING REMEDIAL SANCTIONS. THE COMMISSION FOUND THAT VISION, REGISTERED WITH THE COMMISSION AS A FUTURES COMMISSION MERCHANT ("FCM") AND WITH THE SECURITIES AND EXCHANGE COMMISSION ("SEC") AS A BROKER-DEALER ("BD"), VIOLATED THE



COMMODITY EXCHANGE ACT AND COMMISSION REGULATIONS BY BEING AN FCM THAT FAILED TO SEGREGATE COMMODITY FUTURES AND OPTIONS CUSTOMERS' FUNDS. VISION, AFTER USING COMMODITY FUTURES AND OPTIONS CUSTOMER FUNDS TO PURCHASE SECURITIES, FAILED TO ACCOUNT FOR AND HOLD THOSE SECURITIES SEPARATELY FOR ITS CUSTOMERS. INSTEAD, VISION COMMINGLED THE SECURITIES WITH ITS OWN FUNDS AND THE FUNDS OF ITS SECURITIES CUSTOMERS IN VISION'S PARTICIPANT ACCOUNT HELD IN ITS OWN NAME AT THE DEPOSITORY TRUST COMPANY ("DTC"). AS SUCH, VISION FAILED TO COMPLY WITH REQUIREMENTS FOR HOLDING AND SEGREGATING CUSTOMER FUNDS AS SET FORTH IN SECTION 4D(A)(2) OF THE COMMODITY EXCHANGE ACT, 7 U.S. C. § 6D(A)(2), AND REGULATIONS 1.20 AND 1.26, 17 C.F.R. §§ 1.20 AND 1.26. VISION'S VIOLATIONS OF FCM SEGREGATION REQUIREMENTS WENT UNDETECTED DURING THE RELEVANT PERIOD BECAUSE VISION DID NOT REPORT TO ITS DESIGNATED SELF-REGULATORY ORGANIZATION ("DSRO") OR THE COMMISSION THAT THE AMOUNT ON DEPOSIT IN SEGREGATED ACCOUNTS WAS LESS THAN THE TOTAL AMOUNT REQUIRED BY THE COMMODITY EXCHANGE ACT AND MISSTATED IN MONTHLY SEGREGATION STATEMENTS FILED WITH THE COMMISSION THE LOCATION AND MANNER IN WHICH THE CUSTOMER FUNDS WERE BEING HELD. VISION REPRESENTED TO THE COMMISSION THAT THE CUSTOMER FUNDS WERE "DEPOSITED IN SEGREGATED FUNDS BANK ACCOUNTS," WHEN, IN FACT, CERTAIN VISION PERSONNEL INVOLVED WITH PREPARING AND SUBMITTING THE MONTHLY SEGREGATION STATEMENTS KNEW THAT THE ASSETS WERE NOT HELD AT A BANK BUT ACTUALLY WERE HELD IN VISION'S ACCOUNT AT DTC, WHICH INCLUDED FUNDS OF VISION AND OTHERS. VISION'S FAILURE TO NOTIFY ITS DSRO AND THE COMMISSION AND ITS MISSTATEMENTS VIOLATED REGULATIONS 1.10(D)(1)(V) AND (VI) AND 1.12(H), 17 C.F.R. §§ 1.10(D)(1)(V) AND (VI) AND 1.12(H). VISION'S SEGREGATION VIOLATIONS AND MISSTATEMENTS WERE UNCOVERED IN JUNE 2009 DURING A REGULATORY EXAMINATION BY VISION'S DSRO, AFTER WHICH VISION WAS INFORMED OF THE SEGREGATION VIOLATIONS. VISION THEREAFTER RESTATED ITS MONTHLY SEGREGATION STATEMENTS, DEDUCTING THE VALUE OF THE CUSTOMER FUNDS HELD IN THE DTC ACCOUNT FROM ITS CALCULATION OF TOTAL SEGREGATED FUNDS. FROM AUGUST 2008 THROUGH NOVEMBER 2008, DEDUCTING THE VALUE OF THESE FUNDS FROM VISION'S TOTAL FUNDS IN SEGREGATION DID NOT CAUSE THE FIRM TO BE UNDER-SEGREGATED BECAUSE VISION HAD ENOUGH EXCESS IN SEGREGATION TO MEET ITS REGULATORY REQUIREMENT. HOWEVER, FROM DECEMBER 2008 THROUGH MAY 2009, WHEN VISION HAD INVESTED LARGER AMOUNTS OF CUSTOMER FUNDS IN SECURITIES, EXCLUDING THEIR VALUE FROM VISION'S CALCULATION OF TOTAL FUNDS IN SEGREGATION PUT VISION IN A POSITION OF UNDER-SEGREGATION FOR THE ENTIRE SIX (6) MONTH PERIOD. PRIOR TO THE



CME'S EXAMINATION AND THROUGHOUT THE RELEVANT PERIOD, VISION DID NOT NOTIFY ITS DSRO OR THE CFTC THAT IT WAS UNDER-SEGREGATED

Initiated By:	COMMODITY FUTURES TRADING COMMISSION
Date Initiated:	09/27/2013
Docket/Case Number:	13-39
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	09/27/2013
Sanctions Ordered:	Monetary/Fine \$525,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	POST-JUDGMENT INTEREST
Sanction Details:	ACCORDINGLY, IT IS HEREBY ORDERED THAT VISION AND ITS SUCCESSORS AND ASSIGNS SHALL CEASE AND DESIST FROM VIOLATING SECTION 4D(A)(2) OF THE ACT, 7 U.S.C. § 6D(A)(2), AND COMMISSION REGULATIONS 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26, 17 C.F.R. §§ 1.10(D)(1)(V) AND (VI), 1.12(H), 1.20 AND 1.26. VISION SHALL PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF \$525,000, PLUS POST-JUDGMENT INTEREST WITHIN TEN (10) BUSINESS DAYS OF THE DATE OF ENTRY OF THE ORDER. VISION AND ITS SUCCESSORS AND ASSIGNS SHALL COMPLY WITH THE CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER.
Firm Statement	VISION AND THE CFTC REACHED A MUTUAL SETTLEMENT REGARDING THIS MATTER. VISION NEITHER ADMITS OR DENIES THE FINDINGS IN THIS MATTER. WE STRONGLY BELIEVE THAT WE HAVE LEARNED AND GROWN AND OUR MANAGEMENT TEAM IS FULLY COMMITTED TO ENSURING THAT VISION REMAINS IN COMPLIANCE WITH ALL CFTC RULES AND REGULATIONS.

Disclosure 25 of 30

Reporting Source:	Regulator
Current Status:	Final



Allegations: CFTC RELEASE 6706-13, SEPTEMBER 24, 2013: THE COMMODITY FUTURES TRADING COMMISSION ("COMMISSION") HAD REASON TO BELIEVE THAT FROM ON OR ABOUT MAY 2012 UNTIL JANUARY 2013 VISION FINANCIAL MARKETS LLC ("VISION") VIOLATED COMMISSION REGULATION ("REGULATION") 166.3, 17 C.F.R § 166.3 (2012). THEREFORE, THE COMMISSION DEEMED IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED TO DETERMINE WHETHER VISION HAD ENGAGED IN THE VIOLATION AND TO DETERMINE WHETHER ANY ORDER SHOULD BE ISSUED IMPOSING REMEDIAL SANCTIONS.

THE COMMISSION FOUND THAT VISION, WHILE ACTING AS A FUTURES COMMISSION MERCHANT ("FCM") FOR A VISION CUSTOMER ("CUSTOMER"), FAILED TO DILIGENTLY SUPERVISE ITS EMPLOYEES IN THE HANDLING OF CUSTOMER'S COMMODITY INTEREST ACCOUNTS. SPECIFICALLY, IN MAY 2012, VISION FAILED TO (1) AGGREGATE CUSTOMER'S MULTIPLE TRADING ACCOUNTS HELD AT VISION WHEN CALCULATING CUSTOMER'S SPECULATIVE POSITIONS; (2) FAILED TO USE THE PROPER DELTA IN CALCULATING CUSTOMER'S AGGREGATE FUTURES EQUIVALENT NET POSITIONS, AND (3) UTILIZED A SOFTWARE PROGRAM WHICH INCORRECTLY CALCULATED FUTURES EQUIVALENT NET POSITIONS AND, AFTER THE DEFICIENCY WAS DISCOVERED IN JULY 2012, IT WAS NOT CORRECTED UNTIL JANUARY 2013.

THE COMMISSION FOUND THAT, FROM AT LEAST MAY OF 2012 TO JANUARY OF 2013, VISION VIOLATED COMMISSION REGULATION 166.3, 17 C.F.R. § 166.3 (2012).

Initiated By: COMMODITY FUTURES TRADING COMMISSION

Date Initiated: 09/24/2013

Docket/Case Number: 13-36

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/24/2013



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:	Monetary/Fine \$140,000.00 Cease and Desist/Injunction
Other Sanctions Ordered:	UNDERTAKINGS
Sanction Details:	ACCORDINGLY, IT IS HEREBY ORDERED THAT VISION SHALL CEASE AND DESIST FROM VIOLATING COMMISSION REGULATION 166.3, 17 C.F.R. § 166.3 (2013); VISION SHALL PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF ONE HUNDRED AND FORTY THOUSAND DOLLARS (\$140,000) WITHIN TEN (10) DAYS OF THE DATE OF THE ENTRY OF THE ORDER. VISION AND ITS SUCCESSORS AND ASSIGNS SHALL COMPLY WITH THE CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER.
Regulator Statement	IN ANTICIPATION OF THE INSTITUTION OF THE ADMINISTRATIVE PROCEEDING, VISION SUBMITTED AN OFFER OF SETTLEMENT ("OFFER"), WHICH THE COMMISSION DETERMINED TO ACCEPT. WITHOUT ADMITTING OR DENYING ANY OF THE FINDINGS OR CONCLUSIONS, VISION CONSENTED TO THE ENTRY OF THE ORDER INSTITUTING PROCEEDINGS PURSUANT TO SECTIONS 6(C) AND 6(D) OF THE COMMODITY EXCHANGE ACT, MAKING FINDINGS AND IMPOSING REMEDIAL SANCTIONS ("ORDER") AND ACKNOWLEDGED SERVICE OF THE ORDER.
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Reporting Source:	Firm
Current Status:	Final
Allegations:	CFTC RELEASE 6706-13, SEPTEMBER 24, 2013: THE COMMODITY FUTURES TRADING COMMISSION ("COMMISSION") HAD REASON TO BELIEVE THAT FROM ON OR ABOUT MAY 2012 UNTIL JANUARY 2013 VISION FINANCIAL MARKETS LLC ("VISION") VIOLATED COMMISSION REGULATION ("REGULATION") 166.3, 17 C.F.R § 166.3 (2012). THEREFORE, THE COMMISSION DEEMED IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE PROCEEDINGS BE INSTITUTED TO DETERMINE WHETHER VISION HAD ENGAGED IN THE VIOLATION AND TO DETERMINE WHETHER ANY ORDER SHOULD BE ISSUED IMPOSING REMEDIAL SANCTIONS. THE COMMISSION FOUND THAT VISION, WHILE ACTING AS A FUTURES COMMISSION MERCHANT ("FCM") FOR A VISION CUSTOMER ("CUSTOMER"), FAILED TO DILIGENTLY SUPERVISE ITS EMPLOYEES IN THE HANDLING OF CUSTOMER'S COMMODITY INTEREST ACCOUNTS. SPECIFICALLY, IN MAY 2012, VISION FAILED TO (1)



AGGREGATE CUSTOMER'S MULTIPLE TRADING ACCOUNTS HELD AT VISION WHEN CALCULATING CUSTOMER'S SPECULATIVE POSITIONS; (2) FAILED TO USE THE PROPER DELTA IN CALCULATING CUSTOMER'S AGGREGATE FUTURES EQUIVALENT NET POSITIONS, AND (3) UTILIZED A SOFTWARE PROGRAM WHICH INCORRECTLY CALCULATED FUTURES EQUIVALENT NET POSITIONS AND, AFTER THE DEFICIENCY WAS DISCOVERED IN JULY 2012, IT WAS NOT CORRECTED UNTIL JANUARY 2013. THE COMMISSION FOUND THAT, FROM AT LEAST MAY OF 2012 TO JANUARY OF 2013, VISION VIOLATED COMMISSION REGULATION 166.3, 17 C.F.R. § 166.3 (2012).

Initiated By: COMMODITY FUTURES TRADING COMMISSION

Date Initiated: 09/24/2013

Docket/Case Number: 13-36

Principal Product Type: Futures - Commodity

Other Product Type(s):

Principal Sanction(s)/Relief Sought:

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/24/2013

Sanctions Ordered: Monetary/Fine \$140,000.00
Cease and Desist/Injunction

Other Sanctions Ordered:

Sanction Details: ACCORDINGLY, IT IS HEREBY ORDERED THAT VISION SHALL CEASE AND DESIST FROM VIOLATING COMMISSION REGULATION 166.3, 17 C.F.R. § 166.3 (2013); VISION SHALL PAY A CIVIL MONETARY PENALTY IN THE AMOUNT OF ONE HUNDRED AND FORTY THOUSAND DOLLARS (\$140,000) WITHIN TEN (10) DAYS OF THE DATE OF THE ENTRY OF THE ORDER. VISION AND ITS SUCCESSORS AND ASSIGNS SHALL COMPLY WITH THE CONDITIONS AND UNDERTAKINGS SET FORTH IN THE OFFER

Firm Statement VISION AND THE CFTC REACHED A MUTUAL SETTLEMENT REGARDING THIS MATTER. VISION NEITHER ADMITS OR DENIES THE FINDINGS IN THIS MATTER. WE STRONGLY BELIEVE THAT WE HAVE LEARNED AND GROWN AND OUR MANAGEMENT TEAM IS FULLY COMMITTED TO ENSURING THAT VISION REMAINS IN COMPLIANCE WITH ALL CFTC RULES AND REGULATIONS.



Disclosure 26 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	NFA COMPLIANCE RULES 2-4, 2-9(A) AND 2-10: ON SEPTEMBER 11, 2013, NFA ISSUED A COMPLAINT CHARGING VISION FINANCIAL MARKETS LLC ("VISION"), A FUTURES COMMISSION MERCHANT AND COMMODITY POOL OPERATOR NFA MEMBER, WITH FAILURE TO OBSERVE HIGH STANDARDS OF COMMERCIAL HONOR AND JUST AND EQUITABLE PRINCIPLES OF TRADE, AND FAILURE TO MAINTAIN ADEQUATE RECORDS AND MAKE APPROPRIATE INQUIRIES. THE COMPLAINT ALSO CHARGED VISION, A PRINCIPAL AND ASSOCIATED PERSON ("AP") OF VISION AND AN NFA ASSOCIATE, AND AN ANOTHER AP OF VISION AND AN NFA ASSOCIATE, WITH FAILURE TO SUPERVISE.
Initiated By:	NATIONAL FUTURES ASSOCIATION
Date Initiated:	09/11/2013
Docket/Case Number:	13-BCC-018
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Order
Resolution Date:	06/20/2014
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 \$1,500,000.00
Other Sanctions Ordered:	VISION SHALL WITHDRAW FROM NFA MEMBERSHIP WITHIN SIX MONTHS OF THE DATE OF THIS DECISION; AND SHOULD VISION REAPPLY FOR NFA MEMBERSHIP AFTER IT HAS WITHDRAWN, NFA MAY USE THE COMMITTEE'S COMPLAINT AND THIS DECISION AS THE SOLE BASIS FOR



DENYING VISION'S APPLICATION.

Sanction Details:

SEE ABOVE

Regulator Statement

NFA RELEASE, JUNE 20, 2014: HAVING REVIEWED ALL MATTERS RELEVANT TO THE COMPLAINT ISSUED BY THE NFA AGAINST VISION FINANCIAL MARKETS LLC AND TWO INDIVIDUALS, AND HAVING CONSIDERED THE OFFER OF SETTLEMENT SUBMITTED BY THE RESPONDENTS AND HAVING ACCEPTED THEIR OFFER, THE PANEL OF NFA'S HEARING COMMITTEE DESIGNATED TO CONSIDER THIS CASE ISSUES THIS DECISION. PURSUANT TO THE RESPONDENT'S OFFER, THE HEARING PANEL ENTERS THE FINDINGS THAT VISION VIOLATED NFA COMPLIANCE RULE 2-4, IN THAT IT FAILED TO OBSERVE HIGH STANDARDS OF COMMERCIAL HONOR AND JUST AND EQUITABLE PRINCIPLES OF TRADE; NFA COMPLIANCE RULE 2-10, IN THAT IT FAILED TO MAINTAIN ADEQUATE RECORDS AND MAKE APPROPRIATE INQUIRES; AND VIOLATED NFA COMPLIANCE RULE 2-9(A), IN THAT IT FAILED TO DILIGENTLY SUPERVISE CERTAIN ASPECTS OF THE FIRM'S OPERATIONS.

Reporting Source:

Firm

Current Status:

Final

Allegations:

THE ALLEGATION IS AS FOLLOWS:
NFA COMPLIANCE RULES 2-4, 2-9(A) AND 2-10: ON SEPTEMBER 11, 2013, NFA ISSUED A COMPLAINT CHARGING VISION FINANCIAL MARKETS LLC ("VISION"), A FUTURES COMMISSION MERCHANT AND COMMODITY POOL OPERATOR NFA MEMBER, WITH FAILURE TO OBSERVE HIGH STANDARDS OF COMMERCIAL HONOR AND JUST AND EQUITABLE PRINCIPLES OF TRADE, AND FAILURE TO MAINTAIN ADEQUATE RECORDS AND MAKE APPROPRIATE INQUIRIES. THE COMPLAINT ALSO CHARGED VISION, A PRINCIPAL AND ASSOCIATED PERSON ("AP") OF VISION AND AN NFA ASSOCIATE, AND AN ANOTHER AP OF VISION AND AN NFA ASSOCIATE, WITH FAILURE TO SUPERVISE.

Initiated By:

NATIONAL FUTURES ASSOCIATION

Date Initiated:

09/11/2013

Docket/Case Number:

13-BCC-018

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought:



Other Sanction(s)/Relief Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 06/20/2014

Sanctions Ordered: Monetary/Fine \$1,500,000.00

Other Sanctions Ordered: VISION AGREED TO THE DECISION ACCEPTING ITS OFFER OF SETTLEMENT THAT REQUIRES VISION TO WITHDRAW FROM NFA MEMBERSHIP WITHIN SIX MONTHS (OR MORE IF EXTENDED BY THE HEARING PANEL FOR GOOD CAUSE) BECAUSE IN A SEPARATE AGREEMENT THE NFA AGREED TO PERMIT VISION TO RESTRUCTURE ITS FCM BUSINESS BY CREATING A HOLDING COMPANY TO OWN A NEW FCM TO WHICH ALL ASSETS (INCLUDING CUSTOMER ACCOUNTS) WILL BE TRANSFERRED. THE HOLDING COMPANY MAY BE OWNED BY VISION'S CURRENT OWNERS AND THIS SETTLEMENT MAY NOT BE THE BASIS FOR DENYING REGISTRATION OF THE NEW FCM.

Sanction Details: PLEASE SEE ABOVE

Firm Statement

THE NFA ALLEGED THAT AN INDEPENDENT COMMODITY TRADING ADVISOR MISUSED AN ALLOCATION ACCOUNT ON VISION'S BOOKS TO MISAPPROPRIATE CUSTOMER FUNDS BACK IN 2009-2011, BUT THERE WERE NO ALLEGATIONS THAT VISION RECEIVED ANY FINANCIAL GAIN FROM THE TRADING ADVISOR'S ACTIVITIES. NEVERTHELESS, VISION REIMBURSED THE CUSTOMERS OVER \$2 MILLION. NONE OF THE FINDINGS AGAINST VISION INVOLVED FRAUD OR A WILLFUL VIOLATION OF NFA RULES. THE FINDINGS AGAINST VISION WERE LIMITED TO NFA COMPLIANCE RULE 2-4 (FAILURE TO OBSERVE JUST AND EQUITABLE PRINCIPLES), RULE 2-10 (FAILURE TO MAINTAIN ADEQUATE RECORDS), AND RULE 2-9(A) (FAILURE TO SUPERVISE). THE SETTLEMENT RESOLVES ALL OUTSTANDING REGULATORY ISSUES WITH THE NFA UP TO JUNE 20, 2014, THE DATE OF THE SETTLEMENT. THE TERMS OF THE SETTLEMENT AND THE SEPARATE BINDING AGREEMENT BETWEEN VISION AND THE NFA INCLUDE:

A.NFA AGREED THAT VISION MAY TRANSFER ITS FCM BUSINESS AND CUSTOMER ACCOUNTS TO A NEW COMPANY, NAMED HIGH RIDGE FUTURES LLC ("HIGH RIDGE"), WHICH WILL BE OWNED PRINCIPALLY BY VISION'S CURRENT OWNERS, HOWARD ROTHMAN AND ROBERT BOSHACK, INDIRECTLY THROUGH A NEWLY FORMED HOLDING COMPANY. THE DECISION WILL NOT BE A BASIS TO DENY REGISTRATION OF HIGH RIDGE AS AN FCM. THE CURRENT ENTITY, VISION, WILL CONTINUE TO OPERATE AS A BROKER-DEALER, ALSO AS A WHOLLY-OWNED SUBSIDIARY OF THE HOLDING COMPANY. VISION WILL WITHDRAW ITS FCM REGISTRATION UPON THE EFFECTIVENESS OF HIGH RIDGE'S FCM APPLICATION.



B.RICHARD DEMATTEO WILL BECOME THE CHIEF EXECUTIVE OFFICER OF HIGH RIDGE WITH FINAL AUTHORITY OVER ITS MANAGEMENT AND REGULATORY AFFAIRS. HIGH RIDGE WILL HIRE A NEW CHIEF COMPLIANCE OFFICER.

C.HIGH RIDGE, HOWARD ROTHMAN AND ROBERT BOSHNACK AGREED TO GUARANTEE THE PAYMENT OF THE FINE IMPOSED ON VISION.

D.NEITHER STEVEN SILVER NOR BRUCE NEWMAN MAY BE PRINCIPALS OR SUPERVISORS OF HIGH RIDGE.

E.ALTROUGH ROTHMAN WILL NOT BE AN ASSOCIATED PERSON OF HIGH RIDGE, ROTHMAN MAY REGISTER AS A FLOOR BROKER, WHICH IS A BROADER REGISTRATION CATEGORY THAN BEING AN AP, AND CONDUCT FUTURES CUSTOMER BUSINESS THROUGH HIGH RIDGE.

F.HIGH RIDGE WILL NOT HAVE ANY BUSINESS RELATIONSHIP WITH YU DEE CHANG OR ANY ENTITY OF WHICH HE IS A PRINCIPAL OR ASSOCIATED PERSON .

Disclosure 27 of 30

Reporting Source:	Regulator
Current Status:	Final
Allegations:	<p>NFA CASE NO. 11-BCC-003, MAY 18, 2011: HAVING REVIEWED THE INVESTIGATIVE REPORT SUBMITTED BY THE COMPLIANCE DEPARTMENT OF THE NATIONAL FUTURES ASSOCIATION ("NFA"), AND HAVING FOUND REASON TO BELIEVE THAT NFA COMPLIANCE RULES ("NFA REQUIREMENTS") WERE BEING, HAVE BEEN OR ARE ABOUT TO BE VIOLATED AND THAT THE MATTER SHOULD BE ADJUDICATED, NFA'S BUSINESS CONDUCT COMMITTEE ("BCC") ISSUED A COMPLAINT AGAINST VISION FINANCIAL MARKETS LLC ("VISION"). THE NFA ALLEGED THAT VISION VIOLATED NFA COMPLIANCE RULE 2-9(A).</p> <p>THE NFA ALLEGED THAT VISION WAS AN NFA MEMBER FIRM THAT IS A FUTURES COMMISSION MERCHANT ("FCM") AND A COMMODITY POOL OPERATOR ("CPO"). VISION GUARANTEED A NUMBER OF INTRODUCING BROKERS ("GIBS"). THE NFA CHARGED VISION WITH FAILING TO SUPERVISE THE ACTIVITIES OF THE GIBS THAT IT GUARANTEED.</p>
Initiated By:	NATIONAL FUTURES ASSOCIATION
Date Initiated:	05/18/2011
Docket/Case Number:	11-BCC-003
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief	

**Sought:****Other Sanction(s)/Relief
Sought:****Resolution:** Decision**Resolution Date:** 05/18/2011**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 \$500,000.00**Other Sanctions Ordered:** UNDERTAKINGS:

THE NFA ORDERED VISION TO ABIDE BY THE FOLLOWING UNDERTAKINGS
AND OBLIGATIONS:

(A) VISION SHALL RETAIN A QUALIFIED INDEPENDENT CONSULTANT
FAMILIAR WITH THE FUTURES INDUSTRY TO REVIEW EXISTING
PROCEDURES FOR COMPLIANCE WITH ITS SUPERVISORY
RESPONSIBILITIES UNDER NFA COMPLIANCE RULE 2-9 RELATED TO
VISION'S GIBS AND TENDER A WRITTEN REPORT CONTAINING
RECOMMENDATIONS FOR SUPERVISION OF FULL-COMMISSION, BROKER-
ASSISTED, RETAIL CUSTOMER ACCOUNTS INTRODUCED BY VISION'S
GIBS. THE REPORT SHALL REVIEW EXISTING PROCEDURES AND INCLUDE
RECOMMENDATIONS FOR:

REVIEWING TRADING STRATEGIES FOLLOWED BY ANY OF VISION'S
INDIVIDUAL GIBS OR ANY APS THEREOF FOR COMPLIANCE WITH NFA
COMPLIANCE RULE 2-4 RELATING TO TRADING PRACTICES OR
RECOMMENDING TRANSACTIONS TO RETAIL CUSTOMERS THAT MAXIMIZE
THE COMMISSIONS GENERATED WITHOUT REGARD FOR THE BEST
INTERESTS OF THE CUSTOMERS;

REVIEWING COMMISSION-TO-EQUITY RATIOS OF GIBS ON A FIRM-WIDE
AND INDIVIDUAL ACCOUNT BASIS;

SELECTING IBS AND TERMINATING GUARANTEE AGREEMENTS FOR IBS;

DETERMINING WHEN GIBS SHOULD BE SUBJECT TO ENHANCED
SUPERVISORY PROCEDURES, INCLUDING MORE THAN ONE ON-SITE
AUDIT PER YEAR; AND



STAFFING OF VISION'S SUPERVISION AND/OR COMPLIANCE DEPARTMENT(S).

(B) THE CONSULTANT SHALL SUBMIT A REPORT TO VISION AND NFA'S COMPLIANCE DEPARTMENT. BASED ON THE REPORT, VISION SHALL IMPLEMENT UPDATED OR REVISED SUPERVISORY PROCEDURES.

(C) THE CONSULTANT SHALL PERFORM A REVIEW OF VISION'S ONGOING IMPLEMENTATION OF THE UPDATED OR REVISED SUPERVISORY PROCEDURES AT LEAST EVERY SIX MONTHS FOLLOWING THE IMPLEMENTATION AND SHALL ISSUE TIMELY DETAILED REPORTS OF THE FINDINGS OF THOSE REVIEWS TO VISION AND NFA WITH THE LAST REPORT BEING TWO YEARS AFTER THE DATE OF THE DECISION.

(D) VISION SHALL NOT ENTER INTO GUARANTEE AGREEMENTS WITH ANY IBS FOR TWO YEARS FROM THE DATE OF THE DECISION, EXCEPT THAT VISION MAY PETITION THE BCC TO PARTIALLY OR COMPLETELY LIFT THE RESTRICTION.

Sanction Details:

NFA CASE NO. 11-BCC-003, MAY 18, 2011: THE BCC ACCEPTED THE SETTLEMENT OFFER OF VISION FINANCIAL MARKETS LLC. THE NFA FOUND THAT VISION FAILED TO DILIGENTLY SUPERVISE ITS GIBS IN VIOLATION OF NFA COMPLIANCE RULE 2-9(A).

PURSUANT TO A SETTLEMENT OFFER SUBMITTED BY VISION, THE NFA ORDERED IT TO PAY A FINE OF \$500,000.

THE NFA ALSO ORDERED VISION TO DEVELOP AND IMPLEMENT UPDATED OR REVISED SUPERVISORY PROCEDURES WITH RESPECT TO THE SUPERVISION OF VISION'S GIBS WITHIN 180 DAYS OF THE DATE OF THE DECISION.

Reporting Source:

Firm

Current Status:

Final

Allegations:

NFA'S BUSINESS CONDUCT COMMITTEE ("BCC") ISSUED A COMPLAINT AGAINST HOWARD ROTHMAN. THE NFA ALLEGED THAT MR. ROTHMAN VIOLATED NFA COMPLIANCE RULE 2-9 (A).THE NFA ALLEGED THAT MR. ROTHMAN WAS A NFA ASSOCIATE, A LISTED PERSON AND AN ASSOCIATED PERSON OF A NFA MEMBER FIRM THAT IS A FUTURES COMMISSION MERCHANT AND A COMMODITY POOL OPERATOR. THE NFA CHARGED MR. ROTHMAN WITH FAILING TO SUPERVISE THE ACTIVITIES OF THE GIBS THAT HIS FIRM GUARANTEED.



WITHOUT ADMITTING OR DENYING, THE FIRM CONSENTED TO A FINDING BASED ON A ONE COUNT COMPLAINT FOR FAILURE TO SUPERVISE GIB'S IN VIOLATION OF NFA COMPLIANCE RULE 2-9 (A).

Initiated By: NATIONAL FUTURES ASSOCIATION

Date Initiated: 05/18/2011

Docket/Case Number: 11-BCC-003

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Undertaking

Other Sanction(s)/Relief Sought: FINE

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 05/18/2011

Sanctions Ordered: Monetary/Fine \$500,000.00

Other Sanctions Ordered: THERE WERE NO SANCTIONS ON THE SECURITIES SIDE OF THE BUSINESS. UNDERTAKINGS: THE NFA ORDERED VISION TO ABIDE BY THE FOLLOWING UNDERTAKINGS AND OBLIGATIONS: (A) VISION SHALL RETAIN A QUALIFIED INDEPENDENT CONSULTANT FAMILIAR WITH THE FUTURES INDUSTRY TO REVIEW EXISTING PROCEDURES FOR COMPLIANCE WITH ITS SUPERVISORY RESPONSIBILITIES UNDER NFA COMPLIANCE RULE 2-9 RELATED TO VISION'S GIBS AND TENDER A WRITTEN REPORT CONTAINING RECOMMENDATIONS FOR SUPERVISION OF FULL-COMMISSION, BROKER-ASSISTED, RETAIL CUSTOMER ACCOUNTS INTRODUCED BY VISION'S GIBS. THE REPORT SHALL REVIEW EXISTING PROCEDURES AND INCLUDE RECOMMENDATIONS FOR: REVIEWING TRADING STRATEGIES FOLLOWED BY ANY OF VISION'S INDIVIDUAL GIBS OR ANY APS THEREOF FOR COMPLIANCE WITH NFA COMPLIANCE RULE 2-4 RELATING TO TRADING PRACTICES OR RECOMMENDING TRANSACTIONS TO RETAIL CUSTOMERS THAT MAXIMIZE THE COMMISSIONS GENERATED WITHOUT REGARD FOR THE BEST INTERESTS OF THE CUSTOMERS; REVIEWING COMMISSION-TO-EQUITY RATIOS OF GIBS ON A FIRM-WIDE AND INDIVIDUAL ACCOUNT BASIS; SELECTING IBS AND TERMINATING GUARANTEE AGREEMENTS FOR IBS; DETERMINING WHEN GIBS SHOULD BE SUBJECT TO ENHANCED SUPERVISORY PROCEDURES, INCLUDING MORE THAN ONE ON-SITE AUDIT PER YEAR; AND STAFFING OF VISION'S SUPERVISION AND/OR COMPLIANCE DEPARTMENT(S). (B) THE CONSULTANT SHALL SUBMIT A REPORT TO VISION AND NFA'S COMPLIANCE DEPARTMENT. BASED ON THE REPORT, VISION SHALL IMPLEMENT UPDATED OR REVISED SUPERVISORY



PROCEDURES. (C) THE CONSULTANT SHALL PERFORM A REVIEW OF VISION'S ONGOING IMPLEMENTATION OF THE UPDATED OR REVISED SUPERVISORY PROCEDURES AT LEAST EVERY SIX MONTHS FOLLOWING THE IMPLEMENTATION AND SHALL ISSUE TIMELY DETAILED REPORTS OF THE FINDINGS OF THOSE REVIEWS TO VISION AND NFA WITH THE LAST REPORT BEING TWO YEARS AFTER THE DATE OF THE DECISION. (D) VISION SHALL NOT ENTER INTO GUARANTEE AGREEMENTS WITH ANY IBS FOR TWO YEARS FROM THE DATE OF THE DECISION, EXCEPT THAT VISION MAY PETITION THE BCC TO PARTIALLY OR COMPLETELY LIFT THE RESTRICTION.

Sanction Details:

THE NFA ORDERED THE FIRM TO PAY A FINE OF \$500,000. THE NFA ALSO ORDERED VISION TO DEVELOP AND IMPLEMENT UPDATED OR REVISED SUPERVISORY PROCEDURES WITH RESPECT TO THE SUPERVISION OF VISION'S GIBS WITHIN 180 DAYS OF THE DATE OF THE DECISION.

Firm Statement

THE NFA ACTION INVOLVES ONLY FUTURES-RELATED ACTIVITIES. VISION'S FUTURES BUSINESS IS DERIVED FROM ITS OWN APS AND BRANCHES, INDEPENDENT IBS, FOREIGN IBS AND GUARANTEED IBS. THIS ACTION INVOLVED ONLY ITS GIB PORTION OF ITS FUTURES BUSINESS. THE FIRM HAS PROCEDURES FOR SUPERVISING ITS GIBS. THE ALLEGED UNSUPERVISED ACTIVITIES OF THE GIBS TOOK PLACE PRIOR TO 2009. EVEN BEFORE THE NFA FILED ACTIONS IN 2009 AGAINST THE SEPARATE GIBS AND THE BRANCH OFFICE OF THE GIB THAT ALLEGEDLY ENGAGED IN THE ACTIVITIES, THE FIRM HAD TERMINATED ITS GUARANTEES. THE ACTIVITIES INVOLVED FIVE OUT OF THE OVER 100 IBS THAT THE FIRM GUARANTEES. ON MAY 18, 2011, THE FIRM SETTLED THE ACTION SIMULTANEOUSLY WITH THE ISSUANCE OF THE COMPLAINT. THE FIRM HAS UNDERTAKEN TO EMPLOY AN INDEPENDENT CONSULTANT TO REVIEW ITS SUPERVISORY PROCEDURES AND TO IMPLEMENT UPDATED OR REVISED SUPERVISORY PROCEDURES BY NOVEMBER 17, 2011. THE FIRM CANNOT GUARANTEE ANY NEW IBS UNTIL MAY 17, 2013, UNLESS IT PETITIONS THE NFA TO HAVE THIS CONDITION REMOVED BEFORE THEN.

Disclosure 28 of 30
Reporting Source:

Firm

Current Status:

Final

Allegations:

ON AUGUST 2, 2000, NFA'S BUSINESS CONDUCT COMMITTEE ("BCC") ISSUED A COMPLAINT TO VISION LIMITED PARTNERSHIP ("VISION") AND ROBERT BOSHACK ("BOSHACK"). THE COMPLAINT ALLEGES THAT VISION AND BOSHACK USED PROMOTIONAL MATERIAL WHICH IS DECEPTIVE, MISLEADING AND UNBALANCED IN ITS PRESENTATION OF THE POSSIBILITY OF PROFIT AND THE RISK OF LOSS, IN VIOLATION OF NFA COMPLIANCE RULES 2-29 (B)(1), 2-29(B)(2) AND 2-29(B)(3). THE



COMPLAINT ALSO ALLEGES THAT VISION PRESENTED HYPOTHETICAL TRADING PERFORMANCE WITHOUT INCLUDING PAST PERFORMANCE INFORMATION FOR PROPRIETARY TRADING, IN VIOLATION OF NFA COMPLIANCE RULE 2-29(C)(3)(II).

Initiated By:	NATIONAL FUTURES ASSOCIATION (NFA)
Date Initiated:	08/02/2000
Docket/Case Number:	NFA CASE NUMBER 00BCC00005
Principal Product Type:	Other
Other Product Type(s):	SALES PRACTICE, MARKETING MATERIAL
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	05/07/2002
Sanctions Ordered:	Monetary/Fine \$200,000.00
Other Sanctions Ordered:	THE COMMITTEE ALSO ORDERED THAT FOR THREE YEARS FOLLOWING THE DATE OF THE DECISION, VISION AND BOCHNACK SHALL SUBMIT TO NFA, FOR ITS REVIEW AND APPROVAL, ALL PROMOTIONAL MATERIAL WHICH PROMOTES VISION AND/OR ANY CTAS WHICH DIRECT OR MANAGE ACCOUNTS AT VISION, INCLUDING THAT DISSEMINATED BY VISION, ITS GUARANTEED INTRODUCING BROKERS, OR ANY OTHER PARTIES WHICH REFER LEADS TO VISION.
Sanction Details:	THE ORIGINAL FINE WAS \$250,000. IT WAS REDUCED ON APPEAL TO \$200,000. THE ENTIRE FINE WAS LEVELED AGAINST VISION LIMITED PARTNERSHIP, THE APPLICANT. THE FINE WAS PAID IN MAY OF 2002.
Firm Statement	NFA'S HEARING PANEL FOUND THAT VISION VIOLATED NFA COMPLIANCE RULES 2-29(B)(1),(2) AND (3). THE REVIEW PANEL FOUND THAT ROBERT BOSHNACK WAS NOT PERSONALLY LIABLE FOR THE MISLEADING CONTENT AND THE 30 MINUTE VIDEO ON JULY 31, 2002. VISION PAID THE FINE AND HAS SUBMITTED ALL NECESSARY PROMOTIONAL MATERIAL TO THE NFA FOR REVIEW FOR THE REQUIRED TIME PERIOD. IN ADDITION, VISION VOLUNTARILY CONTINUES TO SUBMIT PROMOTIONAL MATERIAL TO THE NFA FOR THEIR REVIEW.

Disclosure 29 of 30

Reporting Source: Firm



Current Status:	Final
Allegations:	THE COMPLAINT ALLEGES THAT VISION FAILED TO DILIGENTLY SUPERVISE IN VIOLATION OF NFA COMPLIANCE RULE 2-9. IT ALSO ALLEGES THAT VISION IMPROPERLY HANDLED A BLOCK ORDER IN VIOLATION OF NFA COMPLIANCE RULE 2-10.
Initiated By:	NATIONAL FUTURES ASSOCIATION (NFA)
Date Initiated:	12/31/1996
Docket/Case Number:	NFA CASE NUMBER 96BCC00018
Principal Product Type:	Other
Other Product Type(s):	FAILURE TO SUPERVISE
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Settled
Resolution Date:	06/18/1998
Sanctions Ordered:	Monetary/Fine \$75,000.00
Other Sanctions Ordered:	NONE
Sanction Details:	ACCORDING TO THE SETTLEMENT OFFER, VISION LP WAS ORDERED TO PAY \$75,000 AND COUNT ONE OF THE COMPLAINT WAS AMENDED TO CHARGE A VIOLATION OF NFA COMPLIANCE RULE 2-23 INSTEAD OF RULE 2-9.
Firm Statement	THE COMPLAINT ALLEGED COMPLIANCE VIOLATIONS ON THE PART OF TWO OF VISION LP'S GUARANTEED INTRODUCING BROKERS FOR WHICH VISION WAS LIABLE AS GUARANTOR. PLEASE NOTE THAT VISION CONTINUOUSLY GUARANTEES APPROXIMATELY 100 INTRODUCING BROKERS. VISION NEITHER ADMITTED NOR DENIED THE ALLEGATIONS AND WITHOUT ANY FINDINGS VISION AGREED TO PAY A FINE OF \$75,000.

Disclosure 30 of 30

Reporting Source:	Firm
Current Status:	Final
Allegations:	THE COMPLAINT ALLEGES THAT VISION LP AND MR. BOSHACK USED PROMOTIONAL MATERIAL WHICH WAS DECEPTIVE AND MISLEADING IN VIOLATION OF NFA COMPLIANCE RULE 2-29 B 1, 2, 3 AND C3II. IT ALSO



ALLEGES VIOLATION OF NFA COMPLIANCE RULE 2-9.

Initiated By: NATIONAL FUTURES ASSOCIATION (NFA)

Date Initiated: 06/30/1993

Docket/Case Number: NFA CASE NUMBER 93BCC00010

Principal Product Type: Other

Other Product Type(s): FAILURE TO SUPERVISE/ADVERTISING

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

Other Sanction(s)/Relief Sought:

Resolution: Settled

Resolution Date: 06/30/1993

Sanctions Ordered: Monetary/Fine \$100,000.00

Other Sanctions Ordered: NONE

Sanction Details: ACCORDING TO THE SETTLEMENT OFFER, VISION LP AND MR. BOSHACK PAID AN AGGREGATE OF \$100,000. VISION WAS ORDERED TO NOT INCREASE ITS INTRODUCING BROKERS AND TO UNDERTAKE ENHANCED COMPLIANCE PROCEDURES FOR ONE YEAR. MR. BOSHACK WAS ORDERED TO LIMIT ACTIVITIES TO ADMINISTRATIVE AND EXECUTIVE FOR ONE YEAR.

Firm Statement THE COMPLAINT ALLEGED A FAILURE TO SUPERVISE GUARANTEED INTRODUCING BROKERS AND THE USE OF MISLEADING PROMOTIONAL MATERIAL IN CONNECTION WITH THE SOLICITATION OF ACCOUNTS TO BE TRADED BY AN INDEPENDENT COMMODITY TRADING ADVISOR. VISION DID NOT ADMIT OR DENY THESE ALLEGATIONS. VISION PAID THE FINE AND UNDERTOOK THE ADAPTION OF ENHANCED COMPLIANCE PROCEDURES. THE FINDINGS AGAINST MR. BOSHACK WERE DISMISSED BY BOTH THE HEARING COMMITTEE AND THE APPEALS COMMITTEE.

End of Report



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