

BrokerCheck Report

OLD MISSION CAPITAL, LLC

CRD# 146991

Section Title	Page(s)		
Report Summary	1		
Firm Profile	2 - 11		
Firm History	12		
Firm Operations	13 - 22		
Disclosure Events	23		



When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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
 - o 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.

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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.

www.finra.org/brokercheck
User Guidance

OLD MISSION CAPITAL, LLC

CRD# 146991

SEC# 8-67867

Main Office Location

1 N. DEARBORN ST. 8TH FLOOR CHICAGO, IL 60602 Regulated by FINRA Chicago Office

Mailing Address

1 N. DEARBORN ST. 8TH FLOOR CHICAGO, IL 60602

Business Telephone Number

312-235-5371

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 Illinois on 03/19/2008. 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
- 24 Self-Regulatory Organizations
- 0 U.S. states and territories

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

This firm conducts 4 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:

Туре	Count	
Regulatory Event	8	

This firm is classified as a limited liability company.

This firm was formed in Illinois on 03/19/2008.

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.

OLD MISSION CAPITAL, LLC

Doing business as OLD MISSION CAPITAL, LLC

CRD# 146991

SEC# 8-67867

Main Office Location

1 N. DEARBORN ST. 8TH FLOOR CHICAGO, IL 60602

Regulated by FINRA Chicago Office

Mailing Address

1 N. DEARBORN ST. 8TH FLOOR CHICAGO, IL 60602

Business Telephone Number

312-235-5371



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): OLD MISSION GROUP LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Position MEMBER

Position Start Date 01/2014

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):

GUZOWSKI, JOSEF MICHAEL

2989719

Is this a domestic or foreign entity or an individual?

Individual

Position

MANAGER

Position Start Date

03/2008

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting

No

company?

KEITH, ALLEN THOMAS

4457493

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Position FINOP

Position Start Date 01/2023

User Guidance

Direct Owners and Executive Officers (continued)

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

Is this a public reporting

No

company?

the firm?

LOOBY, KEVIN PETER

4229297

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Position

CHIEF COMPLIANCE OFFICER

Position Start Date

03/2025

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

Is this a public reporting

company?

the firm?

No

Legal Name & CRD# (if any):

MARQUEZ AVITIA, ERICA NMN

5074353

Is this a domestic or foreign entity or an individual?

Individual

Position

CHIEF OPERATING OFFICER

Position Start Date

01/2018

Percentage of Ownership

Less than 5%

Does this owner direct the management or policies of

Yes

the firm?

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

NICHOLS, PATRICK JAMES

Direct Owners and Executive Officers (continued)

4757503

Is this a domestic or foreign entity or an individual?

Individual

Position MANAGER

Position Start Date 10/2011

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):

RUSSINA, BRYAN SCOTT

5031844

Is this a domestic or foreign entity or an individual?

Individual

MANAGER

Position

Position Start Date 01/2009

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting

No

company?



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



Indirect Owners

Legal Name & CRD# (if any): OLD MISSION HOLDINGS LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Company through which indirect ownership is established

OLD MISSION GROUP LLC

Relationship to Direct Owner

OWNER

Relationship Established

01/2014

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):

GUZOWSKI, JOSEF MICHAEL

2989719

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

OLD MISSION HOLDINGS LLC

Relationship to Direct Owner

MANAGER

Relationship Established

01/2014

Percentage of Ownership

25% but less than 50%

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting company?

Legal Name & CRD# (if any):

No

oompany .

FRAYMAN, ZINA NMN

5829781

Indirect Owners (continued)

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is

OLD MISSION GROUP LLC

Relationship to Direct Owner

established

MEMBER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting

No

company?

LUPILOFF, KEITH ALAN

5198619

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Company through which indirect ownership is established

OLD MISSION GROUP LLC

Relationship to Direct Owner

MEMBER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

MCCARTHY 2012 FAMILY TRUST

Is this a domestic or foreign entity or an individual?

Domestic Entity

Company through which indirect ownership is

OLD MISSION GROUP LLC



User Guidance



Indirect Owners (continued)

established

Relationship to Direct Owner MEMBER

Relationship Established 04/2018

Percentage of Ownership Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting company?

No

Legal Name & CRD# (if any): M

MCCARTHY, JASON ERIC

4708230

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

OLD MISSION GROUP LLC

Relationship to Direct Owner

MEMBER

Relationship Established

05/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting company?

No

MCCARTHY, NEWSHA EBTEHAJ

6945399

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Company through which indirect ownership is established

MCCARTHY 2012 FAMILY TRUST

Relationship to Direct Owner

TRUSTEE

User Guidance Firm Profile



Indirect Owners (continued)

Relationship Established 04/2018

Percentage of Ownership Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting

company?

No

Legal Name & CRD# (if any): MCNULTY, JAMES EDWARD

5199070

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

OLD MISSION GROUP LLC

Relationship to Direct Owner

MEMBER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

MOHRMAN, TRAVIS WILLIAM

4945844

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

OLD MISSION HOLDINGS LLC

Relationship to Direct Owner

MEMBER

Relationship Established

01/2023

Percentage of Ownership

Other General Partners



Indirect Owners (continued)

Does this owner direct the management or policies of the firm?

No

Is this a public reporting company?

No

Legal Name & CRD# (if any):

NICHOLS, PATRICK JAMES

4757503

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

OLD MISSION HOLDINGS LLC

Relationship to Direct Owner

MANAGER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting

company?

No

Legal Name & CRD# (if any):

OLD MISSION PARTNERS LLC

Is this a domestic or foreign entity or an individual?

Domestic Entity

Company through which indirect ownership is established

OLD MISSION HOLDINGS LLC

Relationship to Direct Owner

MEMBER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting

No

User Guidance

Indirect Owners (continued) company?

Legal Name & CRD# (if any): RUSSINA, BRYAN SCOTT

5031844

Is this a domestic or foreign entity or an individual?

Individual

Company through which indirect ownership is established

OLD MISSION HOLDINGS LLC

Relationship to Direct Owner

MANAGER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

Yes

Is this a public reporting

No

company?

SAGAN, JEFFREY RICHARD

5199684

Is this a domestic or foreign entity or an individual?

Legal Name & CRD# (if any):

Individual

Company through which indirect ownership is established

OLD MISSION GROUP LLC

Relationship to Direct Owner

MEMBER

Relationship Established

01/2014

Percentage of Ownership

Other General Partners

Does this owner direct the management or policies of the firm?

No

Is this a public reporting

company?

No

Firm History

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

FINCA

No information reported.

FI

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

Federal Regulator	Status	Date Effective
SEC	Approved	01/12/2009

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	05/21/2024
BOX Exchange LLC	Approved	08/02/2024
Cboe BYX Exchange, Inc.	Approved	04/16/2012
Cboe BZX Exchange, Inc.	Approved	04/16/2012
Cboe EDGA Exchange, Inc.	Approved	04/25/2012
Cboe EDGX Exchange, Inc.	Approved	04/25/2012
Cboe Exchange, Inc.	Approved	09/27/2017
Investors' Exchange LLC	Approved	08/08/2016
Long-Term Stock Exchange, Inc.	Approved	03/19/2025
MEMX LLC	Approved	09/01/2021
MIAX Emerald, LLC	Approved	06/03/2024
MIAX PEARL, LLC	Approved	10/01/2021
Miami International Securities Exchange, LLC	Approved	06/03/2024
NYSE American LLC	Approved	12/07/2023
NYSE Arca, Inc.	Approved	06/09/2009

NYSE National, Inc.	Approved	08/14/2018
NYSE Texas, Inc.	Approved	01/12/2009
Nasdaq BX, Inc.	Approved	09/20/2013
Nasdaq GEMX, LLC	Approved	06/03/2024
Nasdaq ISE, LLC	Approved	04/12/2024
Nasdaq MRX, LLC	Approved	06/03/2024
Nasdaq PHLX LLC	Approved	07/01/2015
Nasdaq Stock Market	Approved	01/28/2013
New York Stock Exchange	Approved	03/10/2025

Registrations (continued)



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 4 types of businesses.

Types of Business

Exchange member engaged in floor activities

Broker or dealer making inter-dealer markets in corporation securities over-the-counter

Municipal securities dealer

Trading securities for own account

Other Types of Business

This firm does effect transactions in commodities, commodity futures, or commodity options.

This firm does not engage in other non-securities business.

Non-Securities Business Description:





Clearing Arrangements

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

Introducing Arrangements

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

Industry Arrangements



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

Name: SMARSH INC

Business Address: 851 SW 6TH

SUITE 800

PORTLAND, OR 97204

Effective Date: 01/12/2009

Description: SMARSH RETAINS THE ELECTRONIC BOOKS AND RECORDS FOR THE

FIRM

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

Name: SOCIETE GENERALE SA

Business Address: 29 BOULEVARD HAUSSMANN

PARIS, FRANCE 75009

Effective Date: 07/28/2025

Description: CLEARING BUSINESS FOR FXPB

Name: CIBC WORLD MARKETS INC.

Business Address: 161 BAY ST

5TH FLOOR

TORONTO, CANADA M5J 2S8

Effective Date: 08/24/2017

Description: CIBC WORLD MARKETS INC. WILL ACT AS THE FIRM'S PRIME BROKER

FOR CANADIAN EQUITY SECURITIES.

Name: GOLDMAN SACHS INTERNATIONAL

Business Address: PETERBOROUGH COURT

133 FLEET STREET

LONDON, UNITED KINGDOM EC4A 2BB

Effective Date: 03/22/2013

Description: OLD MISSION CAPITAL MAINTAINS A CLEARING ARRANGEMENT WITH

GOLDMAN SACHS INTERNATIONAL ON A FULLY DISCLOSED BASIS.

Name: GOLDMAN SACHS & CO. LLC

CRD #: 361

Business Address: 200 WEST STREET

User Guidance

Firm Operations

Industry Arrangements (continued)

NEW YORK, NY 10282-2198

Effective Date: 10/22/2008

Description: SOME OF APPLICANT'S FUNDS AND/OR SECURITIES WILL BE HELD

AND/OR MAINTAINED BY GOLDMAN SACHS & CO. LLC

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.



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.

OLD MISSION ASIA PTE LTD is under common control with the firm.

Business Address: 100 AMOY STREET

SINGAPORE, SINGAPORE 069920

Effective Date: 01/01/2022

Foreign Entity: Yes

Country: SINGAPORE

Securities Activities: Yes

Investment Advisory

Activities:

Nο

Description: AFFILIATED FIRM UNDER OLD MISSION GROUP LLC COMMON CONTROL

OLD MISSION GLOBAL TRADING LLP is under common control with the firm.

Business Address: SUITE 19.07 SALESFORCE TOWER 110 BISHOPSGATE

LONDON, UK EC2N4AY

Effective Date: 02/08/2019

Foreign Entity: Yes

Country: UK

Securities Activities: Yes

Investment Advisory

Activities:

No

Description: OLD MISSION GLOBAL TRADING LLP IS UNDER COMMON CONTROL WITH

OLD MISSION CAPITAL LLC UNDER OLD MISSION GROUP LLC

OLD MISSION EUROPE LLP is under common control with the firm.

Business Address: SUITE 19.07 SALESFORCE TOWER 110 BISHOPSGATE

LONDON, UK EC2N4AY

User Guidance

Organization Affiliates (continued)

Effective Date: 01/01/2016

Foreign Entity: Yes

Country: UK

Securities Activities: Yes

Investment Advisory

No

Activities:

Description: OLD MISSION EUROPE LLP IS UNDER COMMON CONTROL WITH OLD

MISSION CAPITAL LLC UNDER OLD MISSION GROUP LLC

OLD MISSION CAYMAN LTD is under common control with the firm.

Business Address: 27 HOSPITAL RD

GEORGE TOWN, GRAND CAYMAN KY1-9008

Effective Date: 01/01/2016

Foreign Entity: Yes

Country: CAYMAN ISLANDS

Securities Activities: Yes

Investment Advisory

No

Activities:

Description: OLD MISSION CAYMAN LTD IS UNDER COMMON CONTROL WITH OLD

MISSION CAPITAL LLC UNDER OLD MISSION GROUP LLC

OLD MISSION MARKETS LLC is under common control with the firm.

CRD #: 281867

Business Address: 1 N. DEARBORN ST.

8TH FLOOR

CHICAGO, IL 60602

Effective Date: 08/03/2015

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory No

Activities:

Description: OLD MISSION MARKETS LLC IS UNDER COMMON CONTROL WITH OLD

User Guidance

Organization Affiliates (continued)

MISSION CAPITAL LLC UNDER OLD MISSION GROUP LLC

OLD MISSION TRADING LLC is under common control with the firm.

Business Address: 1 N. DEARBORN ST.

8TH FLOOR

CHICAGO, IL 60602

Effective Date: 01/01/2014

Foreign Entity: No

Country:

Securities Activities: Yes
Investment Advisory No

Activities:

Description: OLD MISSION TRADING LLC IS UNDER COMMON CONTROL WITH OLD

MISSION CAPITAL LLC UNDER OLD MISSION GROUP LLC

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	8	0



Disclosure Event Details

What you should know about reported disclosure events:

- 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:
 - o 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.
 - o 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 8

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 THE FIRM VIOLATED SECTION 15(C) OF THE SECURITIES EXCHANGE ACT OF 1934 (THE "EXCHANGE ACT") AND RULE 15C3-1 THEREUNDER BY OPERATING A SECURITIES BUSINESS WHILE NET CAPITAL DEFICIENT ON 11 SEPARATE DAYS. THE FINDINGS STATED THAT THE FIRM MAINTAINED A SPREADSHEET OF ALL OF ITS SECURITIES POSITIONS AND HAIRCUT COMPUTATIONS. THE FIRM USED THIS SPREADSHEET ON A DAILY BASIS TO CALCULATE ITS NET CAPITAL THROUGH MANUALLY-CREATED FORMULAS THAT PULLED RELEVANT DATA FROM THE FIRM'S CLEARING FIRM. DUE TO AN ERROR IN THE FORMULAS USED TO POPULATE THE SPREADSHEET, AFTER A CERTAIN NUMBER OF SECURITIES POSITIONS WERE INCLUDED IN THE SPREADSHEET. ADDITIONAL POSITIONS WOULD NOT APPEAR AND WOULD THEREFORE NOT BE USED IN CALCULATING THE FIRM'S NET CAPITAL. THE NET CAPITAL DEFICIENCIES RANGED FROM APPROXIMATELY \$3 MILLION TO APPROXIMATELY \$81 MILLION. BECAUSE OF THE ERRORS IN ITS NET CAPITAL SPREADSHEET, THE FIRM WAS NOT AWARE OF AND TOOK NO EFFORTS TO PREVENT THESE NET CAPITAL DEFICIENCIES. ON EACH OF THE 11 DAYS IN WHICH THE FIRM WAS NET CAPITAL DEFICIENT, THE FIRM CONDUCTED A SECURITIES BUSINESS BY ENGAGING IN MARKET MAKING AND PROPRIETARY TRADING IN VARIOUS EQUITIES, OPTIONS, AND FUTURES, IN ADDITION, THE FIRM VIOLATED EXCHANGE ACT § 17(A), RULE 17A-3(A)(11) THEREUNDER BY MAINTAINING INACCURATE BOOKS AND RECORDS WITH RESPECT TO ITS NET CAPITAL CALCULATIONS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM. INCLUDING WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH NET CAPITAL REQUIREMENTS. SPECIFICALLY, THE FIRM UNREASONABLY LACKED ANY PROCESS OR PROCEDURE TO ENSURE THE FIRM INCLUDED ALL RELEVANT DATA IN ITS HAIRCUT AND NET CAPITAL CALCULATIONS.

Initiated By: NYSE CHICAGO, INC.

Date Initiated: 12/07/2023

Docket/Case Number: 2022073310401

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Other

Sought:

Other Sanction(s)/Relief

Sought:

N/A

Resolution: Acceptance, Waiver & Consent(AWC)



Resolution Date: 12/07/2023

Does the order constitute a

final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or No

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$250,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM IS CENSURED AND FINED \$250,000.

Reporting Source: Firm

Current Status: Final

Allegations: THE FIRM OPERATED A SECURITIES BUSINESS WHILE NET CAPITAL

DEFICIENT ON 11 SEPARATE DAYS.

Initiated By: NYSE CHICAGO, INC.

Date Initiated: 12/07/2023

Docket/Case Number: 2022073310401

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

N/A

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 12/07/2023

Sanctions Ordered: Censure

Monetary/Fine \$250,000.00

Other Sanctions Ordered:

Sanction Details: THE FIRM WAS CENSURED AND FINED \$250,000

Firm Statement THE AWC PROVIDED THAT THE MEDIAN NET CAPITAL DEFICIENCY OVER

THE 11 DAYS WAS APPROXIMATELY \$19 MILLION. THE LARGEST



DEFICIENCY OCCURRED ON THE FINAL DAY OF THE RELEVANT PERIOD, AND THE FIRM BECAME COMPLIANT WITH NET CAPITAL REQUIREMENTS ON THE FOLLOWING BUSINESS DAY. THE FIRM UNDERTOOK VOLUNTARY REMEDIAL MEASURES TO FIX THE ERROR IN THE SPREADSHEET'S FORMULAS AND TO DATE HAS PREVENTED THE ISSUE FROM OCCURRING AGAIN.

Disclosure 2 of 8

Reporting Source: Regulator

Current Status: Final

Allegations: DURING THE REVIEW PERIOD, THE FIRM, AS A RESULT OF A CODING

ERROR, FAILED TO MARK 29,753,720 NEW ORDERS WITH THE

APPROPRIATE DESIGNATOR TO IDENTIFY THE ORDERS AS PROPRIETARY. THIS CONDUCT CONSTITUTES SEPARATE AND DISTINCT VIOLATIONS OF NYSE ARCA EQUITIES RULES 2010 AND 7.33. AS A RESULT OF FAILING TO

MARK THE NEW ORDERS WITH THE APPROPRIATE PROPRIETARY DESIGNATOR AS DESCRIBED ABOVE, THE FIRM ALSO FAILED TO MARK 356,950,594 CANCEL AND REPLACE ORDERS WITH THE APPROPRIATE DESIGNATOR. THE NYSE ARCA MARKETPLACE DOES NOT PERMIT A FIRM TO ENTER A CAPACITY DESIGNATOR WHEN THE FIRM AMENDS AN

TO ENTER A CAPACITY DESIGNATOR WHEN THE FIRM AMENDS AN EXISTING ORDER BY ENTERING A CANCEL AND REPLACE. AS STATED IN THE EXCHANGE'S TECHNICAL SPECIFICATIONS, WHEN A FIRM ENTERS A CANCEL AND REPLACE, THE NYSE ARCA MARKETPLACE AUTOMATICALLY RETAINS THE DESIGNATION ENTERED BY THE FIRM IN CONNECTION WITH THE ORIGINAL ORDER. THE FIRM KNEW, OR SHOULD HAVE KNOWN, THAT THE NYSE ARCA MARKETPLACE WOULD NOT INCLUDE THE APPROPRIATE DESIGNATION WHEN IT ENTERED THE AFOREMENTIONED CANCEL AND REPLACE ORDERS. TO ENTER THE APPROPRIATE DESIGNATOR WHEN AMENDING AN EXISTING ORDER, A FIRM MUST FIRST CANCEL THE

ORIGINAL ORDER, AND THEN ENTER A NEW ORDER WITH THE APPROPRIATE DESIGNATOR. AS A RESULT, THE 356,950,594 CANCEL AND REPLACE ORDERS ENTERED BY THE FIRM DURING THE REVIEW PERIOD IN CONNECTION WITH THE 29,753,720 NEW ORDERS DESCRIBED ABOVE, FAILED TO INCLUDE THE APPROPRIATE DESIGNATOR IDENTIFYING THE ORDERS AS PROPRIETARY. DURING THE REVIEW PERIOD, THE FIRM

FAILED TO HAVE A SUPERVISORY REVIEW SPECIFICALLY DESIGNATED TO DETECT AND PREVENT THE INACCURATE ENTRY OF THE ORDER

CAPACITY DESIGNATOR. THIS CONDUCT CONSTITUTES A VIOLATION OF

NYSE ARCA EQUITIES RULES 2010, 6.18(B) AND 6.18(C).

Initiated By: NYSE ARCA, INC.

Date Initiated: 05/22/2017



Docket/Case Number: 2014041131701

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief

Sought:

Other

Other Sanction(s)/Relief

Sought:

N/A

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 05/22/2017

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 \$125,000.00

Other Sanctions Ordered:

REVISE THE FIRM'S WRITTEN SUPERVISORY PROCEDURES WITH

RESPECT TO THE AREAS DESCRIBED IN THE DECISION

Sanction Details:

OLD MISSION CAPITAL, LLC AND NYSE ARCA, INC. ENTERED INTO AN OFFER OF SETTLEMENT AND CONSENT FOR THE SOLE PURPOSE OF SETTLING THIS DISCIPLINARY PROCEEDING, WITHOUT ADJUDICATION OF ANY ISSUES OF LAW OR FACT, AND WITHOUT ADMITTING OR DENYING ANY

ALLEGATIONS OR FINDINGS REFERRED TO IN THE OFFER OF SETTLEMENT. THE HEARING OFFICER ACCEPTS THE OFFER OF

SETTLEMENT AND CONSENT AND ISSUES THIS DECISION IN ACCORDANCE

WITH NYSE ARCA EQUITIES RULES. THE FIRM IS CENSURED, FINED \$125,000 AND IS ORDERED TO REVISE ITS WRITTEN SUPERVISORY PROCEDURES WITH RESPECT TO THE AREAS DESCRIBED IN THE

DECISION.

Regulator Statement

IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS DECISION, THE EXCHANGE TOOK INTO CONSIDERATION THE FACT THAT: (I) THE FIRM SELF-REPORTED ITS FAILURE TO MARK ITS ORDERS WITH THE APPROPRIATE DESIGNATOR ON THE EXCHANGE BEFORE THE EXCHANGE BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO MARK ALL ORDERS WITH THE APPROPRIATE DESIGNATOR GOING FORWARD, AND (III) IMPLEMENTED WRITTEN SUPERVISORY PROCEDURES TO DETECT AND PREVENT THE FAILURE TO MARK ORDERS

WITH THE APPROPRIATE DESIGNATOR.



Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD FROM AUGUST 1, 2013 THROUGH APRIL 4, 2014, THE

FIRM FAILED TO INPUT THE CORRECT CAPACITY WITH RESPECT NEW ORDERS ENTERED ON THE NYSE ARCA EXCHANGE. AS A RESULT OF A CODING ERROR, THE FIRM ENTERED THE ORDERS AS AGENCY ORDERS WHEN THEY WERE IN FACT PRINCIPAL ORDERS, AS WELL AS CANCEL

REPLACE ORDERS WITH THE WRONG CAPACITY CODE.

Initiated By: NYSE ARCA, INC.

Date Initiated: 10/13/2015

Docket/Case Number: 20140411317

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

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Other Sanction(s)/Relief

Sought:

MONETARY FINE AND UNDERTAKING

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/22/2017

Sanctions Ordered: Censure

Monetary/Fine \$125,000.00

Other Sanctions Ordered: UNDERTAKING TO REVISE WSP

Sanction Details: THE FIRM WAS CENSURED, FINED \$125,000 AND REQUIRED TO REVISE ITS

WSP. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, NYSE ARCA TOOK INTO CONSIDERATION THE FACT THAT: (I) THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT CAPACITY TO NYSE ARCA BEFORE NYSE ARCA BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE ON ALL ORDERS GOING FORWARD, AND (III) UPDATED ITS WSP TO REFLECT REPORTS IMPLEMENTED TO DETECT AND PREVENT

THE INPUT OF INACCURATE CAPACITY CODES.

Firm Statement THE FIRM WAS CENSURED, FINED \$125,000 AND UNDERTAKES TO REVISE

ITS WSP.



Disclosure 3 of 8

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 INPUT THE CORRECT CAPACITY WITH RESPECT TO 1.720.540 NEW

ORDERS ENTERED ON THE BYX. MORE SPECIFICALLY, AS A RESULT OF A CODING ERROR, THE FIRM ENTERED THE ORDERS AS AGENCY ORDERS

WHEN THEY WERE, IN FACT, PRINCIPAL ORDERS.

THE FINDINGS STATED THAT AS A RESULT OF ENTERING THE WRONG CAPACITY CODE, THE FIRM ALSO ENTERED 57,841,127 CANCELS AND REPLACE ORDERS WITH THE WRONG CAPACITY CODE. THE BYX SYSTEM DOES NOT PERMIT A FIRM TO ENTER A CAPACITY CODE WHEN THE FIRM AMENDS AN ORDER BY ENTERING A CANCEL AND REPLACE. AS A RESULT OF ENTERING THESE 57.841.127 CANCELS AND REPLACE ORDERS DURING THE REVIEW PERIOD IN CONNECTION WITH THE 1,720,540 NEW ORDERS, THE FIRM RETAINED OR REUSED THE INACCURATE CAPACITY CODE ORIGINALLY ENTERED BY THE FIRM. BYX AUDIT TRAILS AND RELATED SURVEILLANCE PROGRAMS RELY ON ACCURATE INFORMATION. INCLUDING ACCURATE CAPACITY CODES. THE ENTRY OF INACCURATE INFORMATION CAUSES THE AUDIT TRAIL TO BE INACCURATE AND ADVERSELY AFFECTS SELF-REGULATORY ORGANIZATION'S ("SROS") ABILITY TO DETECT CONDUCT THAT MAY VIOLATE SRO RULES AND THE FEDERAL SECURITIES LAWS, AND/OR CREATES ALERTS THAT ARE FALSE POSITIVES, REQUIRING THE EXPENDITURE OF UNNECESSARY RESOURCES TO RESOLVE THE ALERTS.

THE FINDINGS ALSO 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 BYX RULE 11.21, REQUIRING FIRMS TO ENTER ACCURATE INFORMATION INTO THE BYX SYSTEM, INCLUDING WHETHER THE FIRM ACTED IN A PRINCIPAL, AGENT, OR RISKLESS PRINCIPAL CAPACITY.

Initiated By: BATS BYX EXCHANGE, INC.

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131706

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: 06/01/2017

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 \$25,000.00

Other Sanctions Ordered:

UNDERTAKING

Sanction Details:

THE FIRM WAS CENSURED AND FINED \$25,000. AN UNDERTAKING TO REVISE THE FIRM'S WRITTEN SUPERVISORY PROCEDURES WITH

RESPECT TO THE PROCEDURES PROVIDING FOR: THE IDENTIFICATION OF THE PERSON(S) RESPONSIBLE FOR SUPERVISION WITH RESPECT TO THE APPLICABLE RULES; A STATEMENT OF THE SUPERVISORY STEP(S) TO BE TAKEN BY THE IDENTIFIED PERSON(S); A STATEMENT AS TO HOW OFTEN SUCH PERSON(S) SHOULD TAKE SUCH STEP(S); AND A STATEMENT AS TO

HOW THE COMPLETION OF THE STEP(S) INCLUDED IN THE WRITTEN

SUPERVISORY PROCEDURES SHOULD BE DOCUMENTED.

PURSUANT TO BYX RULE 8.8, THE DECISION IN THIS MATTER IS FINAL 20 BUSINESS DAYS AFTER THE ISSUANCE OF THE DECISION. THEREFORE,

THIS AWC BECAME FINAL JUNE 1, 2017.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD OF APPROXIMATELY AUGUST 2013 THROUGH APRIL

2014, THE FIRM FAILED TO POPULATE A SIGNIFICANT NUMBER OF PROPRIETARY ORDERS WITH THE CORRECT CAPACITY CODE, DUE TO CODIG ERRORS NAD OTHER COMPUTER INPUTTING ABERRATIONS.

Initiated By: BATS BYX

Date Initiated: 05/03/2017

Docket/Case Number: 20144041131706



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

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

MONETARY FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/03/2017

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered: THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS.

Sanction Details: THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS.

Firm Statement THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, BATS TOOK INTO CONSIDERATION THE FACT THAT: (I)

THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT

CAPACITY TO BATS BZX AND BYX (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE ON ALL ORDERS GOING FORWARD, AND (III) IMPLEMENTED WSPS TO DETECT AND PREVENT THE INPUT OF

INACCURATE CAPACITY CODES.

Disclosure 4 of 8

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 THE FIRM FAILED TO INPUT THE CORRECT CAPACITY WITH RESPECT TO 2,695,407

NEW ORDERS ENTERED ON THE EDGA.

MORE SPECIFICALLY, AS A RESULT OF A CODING ERROR, THE FIRM ENTERED THE ORDERS AS AGENCY ORDERS WHEN THEY WERE IN FACT PRINCIPAL ORDERS. AS A RESULT OF ENTERING THE WRONG CAPACITY CODE. THE FIRM ALSO ENTERED 73.835.707 CANCEL AND REPLACE

ORDERS WITH THE WRONG CAPACITY CODE. AS A RESULT OF ENTERING 73,835,707 CANCEL AND REPLACE ORDERS DURING THE REVIEW PERIOD IN CONNECTION WITH THE 2,695,407 NEW ORDERS, THE FIRM RETAINED OR REUSED THE INACCURATE CAPACITY CODE ORIGINALLY ENTERED BY



THE FIRM. EDGA AUDIT TRAILS AND RELATED SURVEILLANCE PROGRAMS RELY ON ACCURATE INFORMATION, INCLUDING ACCURATE CAPACITY CODES. THE ENTRY OF INACCURATE INFORMATION CAUSES THE AUDIT TRAIL TO BE INACCURATE, AND ADVERSELY AFFECTS SELF-REGULATORY ORGANIZATIONS' ("SROS") ABILITY TO DETECT CONDUCT THAT MAY VIOLATE SRO RULES AND THE FEDERAL SECURITIES LAWS, AND/OR CREATES ALERTS THAT ARE FALSE POSITIVES, REQUIRING THE EXPENDITURE OF UNNECESSARY RESOURCES TO RESOLVE THE ALERTS.

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 EDGA RULE 11.5, REQUIRING FIRMS TO ENTER ACCURATE INFORMATION INTO THE EDGA SYSTEM, INCLUDING WHETHER THE FIRM ACTED IN A PRINCIPAL, AGENT, OR RISKLESS PRINCIPAL CAPACITY.

Initiated By: BATS EDGA EXCHANGE, INC.

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131704

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: 05/03/2017

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 \$25,000.00

Other Sanctions Ordered: UNDERTAKING

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

REVISE THE FIRM'S WRITTEN SUPERVISORY PROCEDURES WITH



RESPECT TO: THE IDENTIFICATION OF THE PERSON(S) RESPONSIBLE FOR SUPERVISION WITH RESPECT TO THE APPLICABLE RULES; A STATEMENT

OF THE SUPERVISORY STEP(S) TO BE TAKEN BY THE IDENTIFIED

PERSON(S); A STATEMENT AS TO HOW OFTEN SUCH PERSON(S) SHOULD TAKE SUCH STEP(S); AND A STATEMENT AS TO HOW THE COMPLETION OF THE STEP(S) INCLUDED IN THE WRITTEN SUPERVISORY PROCEDURES

SHOULD BE DOCUMENTED.

Regulator Statement STAR NO. 20140411317 (INCLUDES MERGED STAR NO. 20150441125)

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD OF AUGUST 30, 2013 THROUGH APRIL 4, 2014 THE

FIRM FAILED TO POPULATE APPROXIMATELY 1,741,237 NEW PROPRIETARY

ORDERS WITH THE CORRECT CAPACITY CODE.

Initiated By: BATS EDGA EXCHANGE, INC.

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131704

Principal Product Type: Other

Other Product Type(s): UNSPECIFIED SECURITIES

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

FINE AND UNDERTAKING

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/03/2017

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered: UNDERTAKING: REVISE THE FIRMS WRITTEN SUPERVISORY PROCEDURES

Sanction Details: THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, EDGX TOOK INTO CONSIDERATION THE FACT THAT: (I)

THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT

CAPACITY TO EDGX BEFORE EDGX BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE

ON ALL ORDERS GOING FORWARD, AND (III) IMPLEMENTED WSPS TO



DETECT AND PREVENT THE INPUT OF INACCURATE CAPACITY CODES.

Firm Statement THE MATTER IS CLOSED WITH AWC

Disclosure 5 of 8

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 INPUT THE CORRECT CAPACITY WITH RESPECT TO 2,518,915 NEW ORDERS ENTERED ON THE BZX. MORE SPECIFICALLY, AS A RESULT OF A CODING ERROR, THE FIRM ENTERED THE ORDERS AS AGENCY ORDERS

WHEN THEY WERE, IN FACT, PRINCIPAL ORDERS.

THE FINDINGS STATED THAT AS A RESULT OF ENTERING THE WRONG CAPACITY CODE, THE FIRM ALSO ENTERED 80,868,755 CANCELS AND REPLACE ORDERS WITH THE WRONG CAPACITY CODE. THE BZX SYSTEM DOES NOT PERMIT A FIRM TO ENTER A CAPACITY CODE WHEN THE FIRM AMENDS AN ORDER BY ENTERING A CANCEL AND REPLACE. AS A RESULT OF ENTERING THESE 80.868.755 CANCELS AND REPLACE ORDERS DURING THE REVIEW PERIOD IN CONNECTION WITH THE 2,518,915 NEW ORDERS, THE FIRM RETAINED OR REUSED THE INACCURATE CAPACITY CODE ORIGINALLY ENTERED BY THE FIRM. BZX AUDIT TRAILS AND RELATED SURVEILLANCE PROGRAMS RELY ON ACCURATE INFORMATION. INCLUDING ACCURATE CAPACITY CODES. THE ENTRY OF INACCURATE INFORMATION CAUSES THE AUDIT TRAIL TO BE INACCURATE AND ADVERSELY AFFECTS SELF-REGULATORY ORGANIZATION'S ("SROS") ABILITY TO DETECT CONDUCT THAT MAY VIOLATE SRO RULES AND THE FEDERAL SECURITIES LAWS. AND/OR CREATES ALERTS THAT ARE FALSE POSITIVES, REQUIRING THE EXPENDITURE OF UNNECESSARY RESOURCES TO RESOLVE THE ALERTS.

THE FINDINGS ALSO 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 BZX RULE 11.21, REQUIRING FIRMS TO ENTER ACCURATE INFORMATION INTO THE BZX SYSTEM, INCLUDING WHETHER THE FIRM ACTED IN A PRINCIPAL, AGENT, OR RISKLESS PRINCIPAL CAPACITY.

Initiated By: BATS BZX EXCHANGE, INC.

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131705



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: 06/01/2017

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 \$25,000.00

Other Sanctions Ordered: UNDERTAKING

Sanction Details: THE FIRM WAS CENSURED AND FINED \$25,000. AN UNDERTAKING TO

REVISE THE FIRM'S WRITTEN SUPERVISORY PROCEDURES WITH

RESPECT TO THE PROCEDURES PROVIDING FOR: THE IDENTIFICATION OF THE PERSON(S) RESPONSIBLE FOR SUPERVISION WITH RESPECT TO THE APPLICABLE RULES; A STATEMENT OF THE SUPERVISORY STEP(S) TO BE TAKEN BY THE IDENTIFIED PERSON(S); A STATEMENT AS TO HOW OFTEN SUCH PERSON(S) SHOULD TAKE SUCH STEP(S); AND A STATEMENT AS TO HOW THE COMPLETION OF THE STEP(S) INCLUDED IN THE WRITTEN

SUPERVISORY PROCEDURES SHOULD BE DOCUMENTED.

PURSUANT TO BZX RULE 8.8, THE DECISION IN THIS MATTER IS FINAL 20 BUSINESS DAYS AFTER THE ISSUANCE OF THE DECISION. THEREFORE.

THIS AWC BECAME FINAL JUNE 1, 2017.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD OF AUGUST 30, 2013 THROUGH APRIL 4, 2014 THE

FIRM FAILED TO POPULATE APPROXIMATELY 1,741,237 NEW PROPRIETARY

ORDERS WITH THE CORRECT CAPACITY CODE.

Initiated By: BATS BZX



Date Initiated: 05/03/2017

Docket/Case Number: 2014041131705

Principal Product Type:

Equity Listed (Common & Preferred Stock)

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

MONETARY FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/03/2017

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered: REVISE THE FIRM'S WRITTEN SUPERVISORY PROCEDURES

Sanction Details: THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET

FORTH IN THIS AWC, THE MATTER IS CLOSED WITH AWC

Firm Statement THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET

FORTH IN THIS AWC,

Disclosure 6 of 8

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 DURING THE PERIOD FROM SEPTEMBER 26, 2013 THROUGH APRIL 4, 2014, THE FIRM FAILED TO INPUT THE CORRECT CAPACITY WITH RESPECT TO 1,009,314 NEW ORDERS ENTERED ON THE NASDAQ STOCK MARKET LLC (NASDAQ). MORE SPECIFICALLY, AS A RESULT OF A CODING ERROR, THE FIRM ENTERED THE ORDERS AS AGENCY ORDERS WHEN THEY WERE IN FACT PRINCIPAL ORDERS. THE FIRM VIOLATED NASDAQ RULES 2010A AND 4611(A)(6). AS A RESULT OF ENTERING THE WRONG CAPACITY CODE AS DESCRIBED ABOVE, THE FIRM ALSO ENTERED 36,828,424 CANCEL AND REPLACE ORDERS WITH THE WRONG CAPACITY CODE. THE NASDAQ MARKET CENTER DOES NOT PERMIT A FIRM TO ENTER A CAPACITY CODE WHEN THE FIRM AMENDS AN EXISTING ORDER BY ENTERING A CANCEL AND REPLACE. WHEN A FIRM ENTERS A CANCEL AND REPLACE, THE



NASDAQ SYSTEM AUTOMATICALLY RETAINS OR RE-USES THE CAPACITY CODE ENTERED BY THE FIRM IN CONNECTION WITH THE ORIGINAL ORDER. TO CHANGE THE CAPACITY CODE WHEN AMENDING AN EXISTING ORDER, A FIRM MUST FIRST CANCEL THE ORIGINAL ORDER, AND THEN ENTER A NEW ORDER WITH THE CORRECT CAPACITY. AS A RESULT OF ENTERING 36.828.424 CANCEL AND REPLACE ORDERS DURING THE REVIEW PERIOD IN CONNECTION WITH THE 1,009,314 NEW ORDERS DESCRIBED ABOVE, THE FIRM RETAINED OR REUSED THE INACCURATE CAPACITY CODE ORIGINALLY ENTERED BY THE FIRM. NASDAQ AUDIT TRAILS AND RELATED SURVEILLANCE PROGRAMS RELY ON ACCURATE INFORMATION, INCLUDING ACCURATE CAPACITY CODES, THE ENTRY OF INACCURATE INFORMATION CAUSES THE AUDIT TRAIL TO BE INACCURATE, AND ADVERSELY AFFECTS SELF-REGULATORY ORGANIZATIONS' (SROS) ABILITY TO DETECT CONDUCT THAT MAY VIOLATE SRO RULES AND THE FEDERAL SECURITIES LAWS, AND/OR CREATES ALERTS THAT ARE FALSE POSITIVES, REQUIRING THE EXPENDITURE OF UNNECESSARY RESOURCES TO RESOLVE THE ALERTS. DURING THE REVIEW PERIOD, 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 NASDAQ RULE 4611(A)(6), REQUIRING FIRMS TO ENTER ACCURATE INFORMATION INTO THE NASDAQ SYSTEM, INCLUDING WHETHER THE FIRM ACTED IN A PRINCIPAL, AGENT, OR RISKLESS PRINCIPAL CAPACITY. SPECIFICALLY, THE FIRM'S SUPERVISORY SYSTEM DID NOT INCLUDE WRITTEN SUPERVISORY PROCEDURES (WSPS) PROVIDING FOR: (1) THE IDENTIFICATION OF THE PERSON(S) RESPONSIBLE FOR SUPERVISION WITH RESPECT TO THE APPLICABLE RULE: (2) A STATEMENT OF THE SUPERVISORY STEP(S) TO BE TAKEN BY THE IDENTIFIED PERSON(S); (3) A STATEMENT AS TO HOW OFTEN SUCH PERSON(S) SHOULD TAKE SUCH STEP(S); AND (4) A STATEMENT AS TO HOW THE COMPLETION OF THE STEP(S) INCLUDED IN THE WRITTEN SUPERVISORY PROCEDURES SHOULD BE DOCUMENTED. AS A RESULT, THE FIRM VIOLATED NASDAQ RULES 2010A AND 3010.

Initiated By: NASDAQ STOCK MARKET

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131702

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: 05/03/2017

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

deceptive conduct?

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered: UNDERTAKING: REQUIRED TO REVISE THE FIRM'S WSPS

Sanction Details: THE FIRM WAS CENSURED, FINED \$25,000 AND UNDERTAKES TO REVISE

ITS WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, NASDAQ TOOK INTO CONSIDERATION THE FACT THAT: (I) THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT CAPACITY ON NASDAQ BEFORE NASDAQ BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE ON ALL ORDERS GOING FORWARD, AND (III) IMPLEMENTED WSPS TO DETECT AND PREVENT THE INPUT OF INACCURATE CAPACITY CODES.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD OF SEPTEMBER 26,2013 THROUGH APRIL 4, 2014 THE

FIRM FAILED TO POPULATE APPROXIMATELY 1,009,314 NEW PROPRIETARY

ORDERS WITH THE CORRECT CAPACITY CODE.

Initiated By: NASDAQ STOCK MARKET

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131702

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: 05/03/2017

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered: UNDERTAKING:REQUIRED TO REVISE THE FIRMS WSPS

Sanction Details: THE FIRM WAS CENSURED, FINED \$25,000 AND UNDERTAKES TO REVISE

ITS WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, NASDAQ TOOK INTO CONSIDERATION THE FACT THAT: (I) THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT CAPACITY ON NASDAQ BEFORE NASDAQ BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE ON ALL ORDERS GOING FORWARD, AND (III) IMPLEMENTED WSPS TO DETECT AND PREVENT THE INPUT OF INACCURATE CAPACITY CODES.

Disclosure 7 of 8

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 DURING THE PERIOD FROM AUGUST 30, 2013 THROUGH APRIL 4, 2014, THE FIRM FAILED TO INPUT THE CORRECT CAPACITY WITH RESPECT TO 1,741,237 NEW ORDERS ENTERED ON THE BATS EDGX EXCHANGE, INC. (EDGX). MORE SPECIFICALLY, AS A RESULT OF A CODING ERROR, THE FIRM ENTERED THE ORDERS AS AGENCY ORDERS WHEN THEY WERE IN FACT PRINCIPAL ORDERS. THE FIRM VIOLATED EDGX RULES 3.1 AND 11.5. AS A RESULT OF ENTERING THE WRONG CAPACITY CODE AS DESCRIBED ABOVE, THE FIRM ALSO ENTERED 50,785,198 CANCEL AND REPLACE ORDERS WITH THE WRONG CAPACITY CODE. EDGA DOES NOT PERMIT A FIRM TO ENTER A CAPACITY CODE WHEN THE FIRM AMENDS AN EXISTING ORDER BY ENTERING A CANCEL AND REPLACE. WHEN A FIRM ENTERS A CANCEL AND REPLACE THE EDGA'S SYSTEM AUTOMATICALLY RETAINS OR RE-USES.

REPLACE, THE EDGA'S SYSTEM AUTOMATICALLY RETAINS OR RE-USES THE CAPACITY CODE ENTERED BY THE FIRM IN CONNECTION WITH THE ORIGINAL ORDER. TO CHANGE THE CAPACITY CODE WHEN AMENDING AN EXISTING ORDER, A FIRM MUST FIRST CANCEL THE ORIGINAL ORDER, AND THEN ENTER A NEW ORDER WITH THE CORRECT CAPACITY. AS A RESULT OF ENTERING 50,785,198 CANCEL AND REPLACE ORDERS DURING THE REVIEW PERIOD IN CONNECTION WITH THE 1,741,237 NEW ORDERS DESCRIBED ABOVE, THE FIRM RETAINED OR REUSED THE INACCURATE CAPACITY CODE ORIGINALLY ENTERED BY THE FIRM. EDGX AUDIT TRAILS

AND RELATED SURVEILLANCE PROGRAMS RELY ON ACCURATE



INFORMATION INCLUDING ACCURATE CAPACITY CODES. THE ENTRY OF INACCURATE INFORMATION CAUSES THE AUDIT TRAIL TO BE INACCURATE, AND ADVERSELY AFFECTS SELF-REGULATORY ORGANIZATIONS' (SROS) ABILITY TO DETECT CONDUCT THAT MAY VIOLATE SRO RULES AND THE FEDERAL SECURITIES LAWS, AND/OR CREATES ALERTS THAT ARE FALSE POSITIVES, REQUIRING THE EXPENDITURE OF UNNECESSARY RESOURCES TO RESOLVE THE ALERTS. DURING THE REVIEW PERIOD, 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 EDGX RULE 11.5, REQUIRING FIRMS TO ENTER ACCURATE INFORMATION INTO THE EDGX SYSTEM, INCLUDING WHETHER THE FIRM ACTED IN A PRINCIPAL, AGENT, OR RISKLESS PRINCIPAL CAPACITY. SPECIFICALLY, THE FIRM'S SUPERVISORY SYSTEM DID NOT INCLUDE WRITTEN SUPERVISORY PROCEDURES (WSPS) PROVIDING FOR: (1) THE IDENTIFICATION OF THE PERSON(S) RESPONSIBLE FOR SUPERVISION WITH RESPECT TO THE APPLICABLE RULE; (2) A STATEMENT OF THE SUPERVISORY STEP(S) TO BE TAKEN BY THE IDENTIFIED PERSON(S): (3) A STATEMENT AS TO HOW OFTEN SUCH PERSON(S) SHOULD TAKE SUCH STEP(S); AND (4) A STATEMENT AS TO HOW THE COMPLETION OF THE STEP(S) INCLUDED IN THE WSPS SHOULD BE DOCUMENTED. AS A RESULT, THE FIRM VIOLATED EDGX RULES 3.1 AND 5.1.

Initiated By: BATS EDGX EXCHANGE, INC.

Date Initiated: 05/03/2017

Docket/Case Number: 2014041131703

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: 05/03/2017

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 \$25,000.00

Other Sanctions Ordered: UNDERTAKING: REVISE THE FIRM'S WSPS

Sanction Details: THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS

WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, EDGX TOOK INTO CONSIDERATION THE FACT THAT: (I)

THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT CAPACITY TO EDGX BEFORE EDGX BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE ON ALL ORDERS GOING FORWARD, AND (III) IMPLEMENTED WSPS TO DETECT AND PREVENT THE INPUT OF INACCURATE CAPACITY CODES.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE PERIOD OF AUGUST 30, 2013 THROUGH APRIL 4, 2014 THE

FIRM FAILED TO POPULATE APPROXIMATELY 1,741,237 NEW PROPRIETARY

ORDERS WITH THE CORRECT CAPACITY CODE.

Initiated By: BATS EDGX

Date Initiated: 05/03/2017

Docket/Case Number: 20140411317-03

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

Other Product Type(s): GENERAL SECURITES

Principal Sanction(s)/Relief

Sought:

Censure

Other Sanction(s)/Relief

Sought:

MONETARY FINE

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 05/03/2017

Sanctions Ordered: Censure

Monetary/Fine \$25,000.00

Other Sanctions Ordered: UNDERTAKING - REVISION OF THE FIRM'S WRITTEN SUPERVISORY

PROCEDURES

Sanction Details: THE MATTER IS CLOSED WITH AWC

Firm Statement THE FIRM WAS CENSURED, FINED \$25,000 AND REQUIRED TO REVISE ITS



WSPS. IN DETERMINING TO RESOLVE THIS MATTER ON THE BASIS SET FORTH IN THIS AWC, EDGX TOOK INTO CONSIDERATION THE FACT THAT: (I) THE FIRM SELF-REPORTED ITS FAILURE TO INPUT THE CORRECT CAPACITY TO EDGX BEFORE EDGX BECAME AWARE OF THE ISSUE, (II) MADE CODING CHANGES SO AS TO INPUT THE CORRECT CAPACITY CODE ON ALL ORDERS GOING FORWARD, AND (III) IMPLEMENTED WSPS TO DETECT AND PREVENT THE INPUT OF INACCURATE CAPACITY CODES.

Disclosure 8 of 8

Reporting Source: Regulator

Current Status: Final

Allegations: OLD MISSION VIOLATED CHX ARTICLE 11, RULE 2, AND EXCHANGE ACT

RULE 17A-3(A)(13), BY FAILING TO MAINTAIN AND KEEP CURRENT ITS BOOKS AND RECORDS WHEN THE FIRM IMPROPERLY FAILED TO ACCOUNT FOR A CAPITAL WITHDRAWAL OF \$2,005,361 AND A CAPITAL INFUSION OF \$3 MILLION CAUSING ITS BOOKS AND RECORDS TO BE INACCURATE FOR MONTH-END CALCULATIONS IN JANUARY, FEBRUARY AND MARCH 2011. THE FIRM ALSO VIOLATED CHX ARTICLE 7, RULE 4(A) AND EXCHANGE ACT RULE 17A-5, BY FILING TO FILE ACCURATE FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORTS PART IIA ("FOCUS REPORTS"), WHICH CONTAINED THE SAME INACCURACIES FOR MONTH-END CALCULATIONS FOR JANUARY, FEBRUARY AND MARCH 2011

AS DESCRIBED ABOVE. IN ADDITION, OLD MISSION VIOLATED CHX ARTICLE 6, RULE 2, INTERPRETATION AND POLICIES .01, AND EXCHANGE ACT RULE 15B3-1, BY FAILING TO TIMELY AMEND ITS FORM BD UNIFORM APPLICATION FOR BROKER-DEALER REGISTRATION TO DISCLOSE A DIRECT OWNER OF THE FIRM, WHEN THE AMENDMENT WAS FILED OVER

SIX MONTHS LATE.

Initiated By: CHICAGO STOCK EXCHANGE

Date Initiated: 04/05/2013

Docket/Case Number: CHX-D-2013-01

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

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

Other Sanction(s)/Relief

Sought:

Resolution: Settled



Resolution Date: 04/05/2013

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

deceptive conduct?

Sanctions Ordered: Monetary/Fine \$10,000.00

Other Sanctions Ordered:

Sanction Details: THE ENTIRE FINE WAS ASSESSED AGAINST OLD MISSION CAPITAL, LLC.

THE ENTIRE FINE WAS PAID ON APRIL 15, 2013.

Reporting Source: Firm

Current Status: Final

Allegations: FAILURE TO MAINTAIN ACCURATE BOOKS AND RECORDS AND FILE

ACCURATE FOCUS PART IIA. SPECIFICALLY, THE FIRM FAILED TO ACCOUNT FOR CAPITAL WITHDRAWALS OCCURRING ON 1/7/11 CAUSING AN OVERSTATEMENT IN OWNERSHIP EQUITY, NET CAPITAL AND EXCESS NET CAPITAL FOR 1/31/11. DURING FEB AND MARCH 2011, THE FIRM ALSO FAILED TO PROPERLY CLASSIFY CAPITAL DISTRIBUTIONS AND PAID-IN CAPITAL FROM A NEW INVESTOR. ADDITIONALLY, THE FIRM FAILED TO TIMELY AMEND ITS FORM BD FOR A NEW DIRECT OWNER IN FEB 2011

Initiated By: CHICAGO STOCK EXCHANGE

Date Initiated: 08/22/2012

Docket/Case Number: CHX-D-2013-01

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief

Sought:

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

Other Sanction(s)/Relief

Sought:

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 04/05/2013

Sanctions Ordered: Monetary/Fine \$10,000.00



Other Sanctions Ordered:

Sanction Details: FINE - \$10,000

www.finra.org/brokercheck

End of Report



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