

BrokerCheck Report

AKUNA SECURITIES LLC

CRD# 159041

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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.

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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.](http://www.finra.org)



AKUNA SECURITIES LLC

CRD# 159041

SEC# 8-68957

Main Office Location

333 S. WABASH AVE.
SUITE 2600
CHICAGO, IL 60604
Regulated by FINRA Chicago Office

Mailing Address

333 S. WABASH AVE.
SUITE 2600
CHICAGO, IL 60604

Business Telephone Number

312 994-4640

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 08/12/2011.

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
- 17 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 not affiliated with any financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

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

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	7



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Delaware on 08/12/2011.

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.

AKUNA SECURITIES LLC

Doing business as AKUNA SECURITIES LLC

CRD# 159041

SEC# 8-68957

Main Office Location

333 S. WABASH AVE.
SUITE 2600
CHICAGO, IL 60604

Regulated by FINRA Chicago Office

Mailing Address

333 S. WABASH AVE.
SUITE 2600
CHICAGO, IL 60604

Business Telephone Number

312 994-4640



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): AKUNA TRADING LLC

Is this a domestic or foreign entity or an individual? Domestic Entity

Position MANAGER

Position Start Date 03/2013

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): ALEXIEVA, NELI MIHAYLOVA

6854926

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

Position CFO

Position Start Date 05/2021

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): DUCKWORTH, RYAN JAMES

5970652

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

Position CEO

Position Start Date 09/2022

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No

Legal Name & CRD# (if any): HYER, THOMAS MICHAEL
5916927

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

Position CHIEF RISK OFFICER

Position Start Date 03/2018

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): JAVIER TORRES, CHRISTINA MARIE
6618037

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

Position CCO, AML-CO

Position Start Date 01/2020

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): RIP, OLGA

Firm Profile



Direct Owners and Executive Officers (continued)

5440553

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

Position FINOP

Position Start Date 05/2024

Percentage of Ownership Less than 5%

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

Is this a public reporting company? No



Firm Profile

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

Indirect Owners

Legal Name & CRD# (if any):	AKUNA HOLDINGS LLC
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	AKUNA TRADING LLC
Relationship to Direct Owner	HOLDING COMPANY
Relationship Established	03/2013
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):	KILLION, ANDREW NEIL
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	AKUNA HOLDINGS
Relationship to Direct Owner	MANAGER
Relationship Established	04/2011
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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

Federal Regulator	Status	Date Effective
SEC	Approved	02/02/2012

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	05/01/2024
Cboe BYX Exchange, Inc.	Approved	09/13/2024
Cboe BZX Exchange, Inc.	Approved	09/15/2015
Cboe C2 Exchange, Inc.	Approved	02/12/2015
Cboe EDGA Exchange, Inc.	Approved	09/13/2024
Cboe EDGX Exchange, Inc.	Approved	08/14/2017
Cboe Exchange, Inc.	Approved	02/02/2012
MIAX Emerald, LLC	Approved	07/01/2024
MIAX PEARL, LLC	Approved	04/17/2017
Miami International Securities Exchange, LLC	Approved	04/17/2017
NYSE American LLC	Approved	10/16/2023
NYSE Arca, Inc.	Approved	08/26/2021
Nasdaq GEMX, LLC	Approved	08/01/2025
Nasdaq ISE, LLC	Approved	01/11/2013
Nasdaq PHLX LLC	Approved	08/01/2017

Nasdaq Stock Market	Approved	07/10/2017
Nasdaq Texas, LLC	Approved	09/28/2023

Firm Operations

Registrations (continued)



Firm Operations



Types of Business

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

This firm currently conducts 4 types of businesses.

Types of Business

Exchange member engaged in floor activities

Put and call broker or dealer or option writer

Trading securities for own account

Other - MARKET MAKING

Other Types of Business

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

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

Non-Securities Business Description:

Firm Operations



Clearing Arrangements

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

Introducing Arrangements

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

Firm Operations

Industry Arrangements



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

Name: SMARSH

Business Address: 921 SW WASHINGTON STREET
SUITE 540
PORTLAND, OR 97205

Effective Date: 10/31/2013

Description: SMARSH IS AKUNA SECURITIES THIRD PARTY EMAIL/IM/SOCIAL MEDIA ARCHIVER IN ACCORDANCE WITH SEC RULE 17A-4(F)(VII).

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

Name: BMO HARRIS BANK N.A.

Business Address: P.O BOX 775
CHICAGO, IL 60690

Effective Date: 04/23/2019

Description: CORPORATE CHECKING ACCOUNT AND CORPORATE MONEY MARKET ACCOUNT HELD BY THE BROKER DEALER.

Name: CIBC U.S.

Business Address: 120 S. LASALLE ST.
CHICAGO, IL 60603

Effective Date: 04/23/2019

Description: BUSINESS CHECKING ACCOUNT HELD BY THE BROKER DEALER

Name: WEDBUSH SECURITIES INC.

CRD #: 877

Business Address: 141 W. JACKSON BLVD.
SUITE 1710-A
CHICAGO, IL 60604

Effective Date: 10/30/2018

Description: WEDBUSH SECURITIES INC. WILL RECEIVE AND MAINTAIN AKUNA SECURITIES, LLC POSITION TRANSFERS FROM ABN AMRO CLEARING CHICAGO.

Name: ABN AMRO CLEARING USA LLC

CRD #: 14020

Firm Operations



Industry Arrangements (continued)

Business Address: 175 W. JACKSON BLVD
SUITE 2050
CHICAGO, IL 60604

Effective Date: 08/20/2011

Description: ABN AMRO CLEARING USA IS AKUNA SECURITIES LLC'S CLEARING FIRM FOR ALL EQUITY AND EQUITY OPTIONS TRADING ACTIVITY. ABN AMRO AND AKUNA SECURITIES LLC ALSO MAINTAIN A JBO AGREEMENT.

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

Control Persons/Financing

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

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



Firm Operations

Organization Affiliates

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

This firm is not, directly or indirectly:

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

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

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



Disclosure Events

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

	Pending	Final	On Appeal
Regulatory Event	0	7	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 7

Reporting Source: Regulator

Current Status: Final



Allegations: AKUNA SECURITIES LLC AND THOMAS G. SEEWALD VIOLATED CBOE RULES 4.1 AND 6.9(E) IN THAT ON OR ABOUT MARCH 14, 2019, SEEWALD, ON BEHALF OF AKUNA, WITH KNOWLEDGE OF ALL THE MATERIAL TERMS AND CONDITIONS OF THE SOLICITED ORDER, AND PRIOR TO THE PUBLIC DISCLOSURE OF THE TERMS AND CONDITIONS OF THE SOLICITED ORDER, PURCHASED PUT OPTIONS CONTRACTS. AKUNA ALSO VIOLATED CBOE RULE 4.24 IN THAT ON OR ABOUT MARCH 14, 2019, THE FIRM FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE WSPS, AND A SUPERVISORY SYSTEM, REASONABLY DESIGNED TO PREVENT AND DETECT VIOLATIONS OF THE RULES OF THE EXCHANGE RELATING TO SOLICITED TRANSACTIONS AND POTENTIAL FRONTRUNNING ACTIVITY.

Initiated By: CBOE EXCHANGE, INC.

Date Initiated: 08/24/2022

Docket/Case Number: STAR NO. 20190619455/FILE NO. USRI-9732-01/URE-29-01

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: 08/24/2022

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 \$105,000.00

Other Sanctions Ordered:

Sanction Details: A CENSURE OF AKUNA AND SEEWALD AND A JOINT AND SEVERAL MONETARY FINE IN THE AMOUNT OF \$105,000.

Reporting Source: Firm

Current Status: Final



Allegations:	AKUNA ENTERED INTO A LETTER OF CONSENT WITH THE CBOE EXCHANGE INC. IN WHICH IT NEITHER ADMITTED OR DENIED THAT VIOLATIONS OF EXCHANGE RULES HAD BEEN COMMITTED. ACCORDING TO THE LETTER OF CONSENT, AKUNA RECEIVED A SOLICITATION REGARDING AN ORDER TO PURCHASE SPX OPTION CONTRACTS; SHORTLY THEREAFTER, WITH KNOWLEDGE OF ALL THE MATERIAL TERMS AND CONDITIONS OF THE ORDER AND PRIOR TO PUBLIC DISCLOSURE OF THE TERMS AND CONDITIONS OF THE ORDER, THE FIRM'S ASSOCIATED PERSON PURCHASED SPX OPTION CONTRACTS AT A DIFFERENT STRIKE PRICE AND RECEIVED A PARTIAL FILL. PURSUANT TO THE LETTER OF CONSENT, THIS PURCHASE VIOLATED CBOE RULES 4.1 AND 6.9(E); THE FIRM ALSO VIOLATED CBOE RULE 4.24 FOR FAILING TO ESTABLISH WRITTEN SUPERVISORY PROCEDURES TO DETECT THE VIOLATIONS OF CBOE RULES REGARDING SOLICITED ORDERS AND POTENTIAL FRONTRUNNING ACTIVITY.
Initiated By:	CBOE EXCHANGE, INC.
Date Initiated:	04/10/2019
Docket/Case Number:	STAR NO. 20190619455/FILE NOS. 9732-01/URE-29-01
Principal Product Type:	Options
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	FINE OF \$105,000.00
Resolution:	Decision & Order of Offer of Settlement
Resolution Date:	08/24/2022
Sanctions Ordered:	Censure Monetary/Fine \$105,000.00
Other Sanctions Ordered:	
Sanction Details:	CENSURE AND FINE OF \$105,000.
Firm Statement	THE SUBJECT ACTS, PRACTICES AND CONDUCT ALLEGED VIOLATED CBOE RULES 4.1, 6.9(E) AND 4.24. AKUNA NEITHER ADMIT NOR DENY THAT VIOLATIONS OF THESE RULES HAVE BEEN COMMITTED.

Disclosure 2 of 7

Reporting Source: Regulator



Current Status: Final

Allegations: AKUNA SECURITIES, LLC: (I) IN THAT ON THREE EXPIRATION DATES FOR VIX OPTIONS AND VX FUTURES, SUBMITTED "STRATEGY ORDERS." IN ADDITION, AKUNA SUBMITTED MINIMUM INCREMENT SPX OPTION ORDERS TO INCREASE THE LIKELIHOOD THAT CERTAIN SPX OPTION SERIES (THAT WERE PART OF ITS STRATEGY ORDERS) WOULD BE BID AND THEREFORE INCLUDED IN THE SOQ; AND (II) FAILED TO SUPERVISE THE TRADING ACTIVITY OF ITS ASSOCIATED PERSONS SO AS TO ASSURE COMPLIANCE WITH EXCHANGE RULE 4.1. VIOLATION OF EXCHANGE RULES 4.1 AND 4.2. AKUNA WAS CENSURED AND FINED \$854,250.

Initiated By: CBOE EXCHANGE, INC.

Date Initiated: 01/14/2019

Docket/Case Number: 19-0002/20160520613

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: 01/31/2019

Sanctions Ordered: Censure
Monetary/Fine \$854,250.00

Other Sanctions Ordered: AKUNA WAS CENSURED AND FINED \$854,250.

Sanction Details: AKUNA WAS CENSURED AND FINED \$854,250.

Reporting Source: Firm

Current Status: Final

Allegations: ON THREE EXPIRATION DATES FOR VIX OPTIONS AND VX FUTURES BETWEEN NOVEMBER 2016 AND NOVEMBER 2017, AKUNA SUBMITTED STRATEGY ORDERS. IN ADDITION, AKUNA SUBMITTED MINIMUM INCREMENT SPX OPTION ORDERS TO INCREASE THE LIKELIHOOD THAT CERTAIN SPX OPTION SERIES (THAT WERE PART OF ITS STRATEGY ORDERS) WOULD BE BID AND THEREFORE INCLUDED IN THE SOQ. AS A RESULT OF THIS CONDUCT, THE FINAL VIX SETTLEMENT VALUES ON



THOSE THREE DATES INCLUDED CERTAIN SPX OPTIONS SERIES THAT OTHERWISE WOULD NOT HAVE BEEN INCLUDED DUE TO THE ZERO BID RULE. FROM IN OR ABOUT NOVEMBER 2016 THROUGH IN OR ABOUT NOVEMBER 2017, AKUNA FAILED TO SUPERVISE ITS ASSOCIATED PERSONS BY FAILING TO ENSURE COMPLIANCE WITH EXCHANGE RULE 4.1. THE ACTS, PRACTICES AND CONDUCT DESCRIBED ABOVE CONSTITUTE A VIOLATION OF EXCHANGE RULE 4.1 BY AKUNA, IN THAT ON THREE EXPIRATION DATES FOR VIX OPTIONS AND VX FUTURES, AKUNA SUBMITTED "STRATEGY ORDERS". IN ADDITION, AKUNA SUBMITTED MINIMUM INCREMENT SPX OPTION ORDERS TO INCREASE THE LIKELIHOOD THAT CERTAIN SPX OPTION SERIES (THAT WERE PART OF ITS STRATEGY ORDERS) WOULD BE BID AND THEREFORE INCLUDED IN THE SOQ. THE ACTS, PRACTICES, AND CONDUCT ABOVE CONSTITUTE A VIOLATION OF EXCHANGE RULE 4.2 BY AKUNA, IN THAT AKUNA FAILED TO SUPERVISE THE TRADING ACTIVITY OF ITS ASSOCIATED PERSONS SO AS TO ASSURE COMPLIANCE WITH EXCHANGE RULE 4.1.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 09/07/2017

Docket/Case Number: STAR NO. 20160520613

Principal Product Type: Index Option(s)

Other Product Type(s): FUTURES

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: 02/01/2019

Sanctions Ordered: Censure
Monetary/Fine \$854,250.00

Other Sanctions Ordered:

Sanction Details: FINED, NO OTHER SANCTIONS WERE IMPOSED.

Firm Statement THE ACTS, PRACTICES AND CONDUCT CONSTITUTE A VIOLATIONS OF EXCHANGE RULES 4.1 AND 4.2. AKUNA NEITHER ADMITTED NOR DENIED THE VIOLATIONS ALLEGED.



Reporting Source: Firm

Current Status: Final

Allegations: ON THREE EXPIRATION DATES FOR VIX OPTIONS AND VX FUTURES BETWEEN NOVEMBER 2016 AND NOVEMBER 2017, AKUNA SUBMITTED "STRATEGY ORDERS." IN ADDITION, AKUNA SUBMITTED MINIMUM INCREMENT SPX OPTION ORDERS TO INCREASE THE LIKELIHOOD THAT CERTAIN SPX OPTION SERIES (THAT WERE PART OF ITS STRATEGY ORDERS) WOULD BE BID AND THEREFORE INCLUDED IN THE SOQ. AS A RESULT OF THIS CONDUCT, THE FINAL VIX SETTLEMENT VALUES ON THOSE THREE DATES INCLUDED CERTAIN SPX OPTIONS SERIES THAT OTHERWISE WOULD NOT HAVE BEEN INCLUDED DUE TO THE ZERO BID RULE DESCRIBED ABOVE. THE ACTS, PRACTICES, AND CONDUCT DESCRIBED ABOVE CONSTITUTE A VIOLATION OF CFE RULES 608 AND 620.

Initiated By: CBOE FUTURES EXCHANGE, LLC

Date Initiated: 01/19/2018

Docket/Case Number: CFE 18-0004

Principal Product Type: Futures - Financial

Other Product Type(s): INDEX OPTIONS

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

Other Sanction(s)/Relief Sought: DISGORGEMENT OF \$6,726.00

Resolution: Decision & Order of Offer of Settlement

Resolution Date: 02/01/2019

Sanctions Ordered: Monetary/Fine \$420,750.00
Disgorgement/Restitution

Other Sanctions Ordered:

Sanction Details: FINED AND DISGORGED - NO OTHER SANCTIONS WERE IMPOSED.

Firm Statement THE ACTS, PRACTICES, AND CONDUCT ABOVE CONSTITUTE VIOLATIONS OF CFE RULES 608 AND 620. AKUNA NEITHER ADMITTED NOR DENIED THE VIOLATIONS ALLEGED.

Disclosure 4 of 7

Reporting Source: Regulator

Current Status: Final



Allegations: IT IS ALLEGED THAT AKUNA, ON NUMEROUS OCCASIONS, FAILED TO GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE. (VIOLATION OF EXCHANGE RULE 6.45B)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 03/07/2017

Docket/Case Number: FILE NO.17-0019/ STAR NO. 20150467028

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: 08/30/2018

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 \$5,000.00

Other Sanctions Ordered:

Sanction Details: A CENSURE AND A FINE OF \$5,000.

Reporting Source: Firm

Current Status: Final

Allegations: DURING THE APPROXIMATE PERIOD FROM ON OR ABOUT JUNE 1, 2013 THROUGH ON OR ABOUT JUNE 30, 2016, AKUNA, ON NUMEROUS OCCASIONS FAILED TO GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 06/19/2017



Docket/Case Number: STAR NO. 20150467028

Principal Product Type: Index Option(s)

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: 08/30/2018

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

Other Sanctions Ordered:

Sanction Details: FINED AND CENSURED, NO OTHER SANCTIONS WERE IMPOSED.

Firm Statement THE ACTS AND PRACTICES DESCRIBED CONSTITUTE A VIOLATION OF EXCHANGE RULE 6.45B BY AKUNA, IN THAT AKUNA, ON NUMEROUS OCCASIONS, FAILED TO GRANT PRIORITY TO THE HIGHEST BID AND/OR LOWEST OFFER WHEN SUCH BID OR OFFER WAS AVAILABLE. AKUNA NEITHER ADMITTED NOR DENIED THE VIOLATIONS ALLEGED.

Disclosure 5 of 7

Reporting Source: Regulator

Current Status: Final

Allegations: AKUNA SECURITIES LLC, AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED \$20,000 FOR: (I) REPORTING NUMEROUS TRANSACTIONS WHERE THE TRADE TIME REPORTED WAS ONE (1) HOUR LATER THAN THE ACTUAL TRADE TIME; AND (II) SUBMITTING NUMEROUS INCORRECT TRADE TIMES TO THE EXCHANGE WHEN REPORTING THE SUBJECT TRANSACTIONS, THUS MISREPRESENTING THE ACTUAL TRADE TIME TO THE EXCHANGE. (EXCHANGE RULES 4.22 - COMMUNICATIONS TO THE EXCHANGE OR THE CLEARING CORPORATION AND 6.51 - REPORTING DUTIES)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 01/04/2016

Docket/Case Number: 15-0102/ 20150450195



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: 02/08/2016
Sanctions Ordered: Censure
 Monetary/Fine \$20,000.00
Other Sanctions Ordered:
Sanction Details: A \$20,000 FINE AND A CENSURE.

Reporting Source: Firm
Current Status: Final
Allegations: FROM ON OR ABOUT OCTOBER 1, 2014 THROUGH ON OR ABOUT APRIL 8, 2015, AKUNA REPORTED NUMEROUS TRANSACTIONS WHERE THE TRADE TIME REPORTED WAS ONE (1) HOUR LATER THAN THE ACTUAL TRADE TIME. FROM ON OR ABOUT OCTOBER 1, 2014 THROUGH ON OR ABOUT APRIL 8, 2015, AKUNA SUBMITTED NUMEROUS INCORRECT TRADE TIMES TO THE EXCHANGE WHEN REPORTING THE SUBJECT TRANSACTIONS, THUS MISREPRESENTING THE ACTUAL TRADE TIME TO THE EXCHANGE.
Initiated By: CHICAGO BOARD OPTIONS EXCHANGE
Date Initiated: 01/04/2016
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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: 02/08/2016



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

Other Sanctions Ordered:

Sanction Details: FINED AND CENSURED, NO OTHER SANCTIONS WERE IMPOSED.

Firm Statement THE ACTS AND PRACTICES DESCRIBED CONSTITUTE A VIOLATION OF EXCHANGE RULES 4.22 AND 6.51 BY AKUNA. AKUNA SUBMITTED AN OFFER OF SETTLEMENT WHICH WAS ACCEPTED BY THE BUSINESS CONDUCT COMMITTEE. AKUNA NEITHER ADMITTED NOR DENIED THE VIOLATIONS ALLEGED.

Disclosure 6 of 7

Reporting Source: Regulator

Current Status: Final

Allegations: AKUNA SECURITIES LLC ("AKUNA"), AN EXCHANGE TPH ORGANIZATION, WAS CENSURED AND FINED \$10,000 FOR THE FOLLOWING CONDUCT: AKUNA, ON NUMEROUS TRADE DATES, FAILED TO MAINTAIN CONTINUOUS ELECTRONIC QUOTES IN AT LEAST 60% OF THE NON-ADJUSTED OPTION SERIES OF EACH APPOINTED OPTION SERIES THAT HAVE A TIME TO EXPIRATION OF LESS THAN NINE MONTHS. (EXCHANGE RULE 8.7(D)(II)(B) - OBLIGATIONS OF MARKET-MAKERS)

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 01/06/2015

Docket/Case Number: 14-0186

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: 02/12/2015

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

Other Sanctions Ordered:



Sanction Details: A \$10,000 FINE AND A CENSURE.

Reporting Source: Firm

Current Status: Final

Allegations: ON SEVERAL TRADE DATES IN OR ABOUT MARCH 2014, AKUNA SECURITIES WAS ALLEGED TO HAVE FAILED TO MAINTAIN ITS CONTINUOUS QUOTING OBLIGATION IN AT LEAST 60% OF THE NON-ADJUSTED OPTION SERIES OF EACH APPOINTED OPTIONS SERIES THAT HAVE A TIME TO EXPIRATION OF LESS THAN NINE MONTHS.

Initiated By: CBOE

Date Initiated: 01/06/2015

Docket/Case Number: 14-0186

Principal Product Type: Index Option(s)

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: 02/12/2015

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

Other Sanctions Ordered:

Sanction Details: AKUNA WAS FINED \$10,000.00 AND CENSURED. NO OTHER PENALTIES WERE IMPOSED.

Firm Statement CBOE'S BUSINESS CONDUCT COMMITTEE ACCEPTED AKUNA'S LETTER OF CONSENT ON FEBRUARY 12, 2015. THIS MATTER IS FINAL.

Disclosure 7 of 7

Reporting Source: Firm

Current Status: Final

Allegations: AKUNA SECURITIES WAS CHARGED WITH A VIOLATION OF CBOE RULE 8. 7(D)(II)(B) FOR FAILING ON VARIOUS DATES THROUGH THE MONTH OF



NOVEMBER 2013 TO MAINTAIN ELECTRONIC QUOTES IN 60% OF THE NON-ADJUSTED OPTIONS SERIES OF ITS APPOINTED CLASSES THAT HAVE A TIME TO EXPIRATION OF LESS THAN NINE MONTHS.

Initiated By: CHICAGO BOARD OPTIONS EXCHANGE

Date Initiated: 12/31/2013

Docket/Case Number: SF14-0001

Principal Product Type: Options

Other Product Type(s):

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

Other Sanction(s)/Relief Sought:

Resolution: Decision

Resolution Date: 09/23/2014

Sanctions Ordered: Censure
Monetary/Fine \$15,000.00

Other Sanctions Ordered: NONE

Sanction Details: AKUNA SECURITIES AS FINED AND CENSURED, NO OTHER SANCTIONS WERE IMPOSED.

Firm Statement AKUNA SECURITIES WAS CHARGED WITH A VIOLATION OF CBOE RULE 8. 7(D)(II)(B) FOR FAILING ON VARIOUS DATES THROUGH THE MONTH OF NOVEMBER 2013 TO MAINTAIN ELECTRONIC QUOTES IN 60% OF THE NON-ADJUSTED OPTIONS SERIES OF ITS APPOINTED CLASSES THAT HAVE A TIME TO EXPIRATION OF LESS THAN NINE MONTHS. AKUNA WAS FINED \$15,000 AND CENSURED. AKUNA PAID ITS FINE ON OCTOBER 6, 2014.

End of Report



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