
DISCIPLINARY NOTICE

SEPTEMBER 18, 2018

CASE NO. 2017-030: SETTLEMENT OF CHARGES AGAINST TRADITUM GROUP LLC

EXCHANGE RULES

Rule 4.01(a) - Duty to Supervise

Every Person shall diligently supervise the Exchange-related activities of such Person's employees and agents. For purposes of this Rule, the term "agent" includes any Exchange-related activities associated with automated trading systems that generate, submit and/or cancel messages without human intervention. Every Person shall also be responsible for the acts and omissions of such employees and agents.

SUMMARY

A subcommittee of the Exchange's Business Conduct Committee ("Subcommittee") found that on multiple occasions between September 2016 and March 2017 an employee of Traditum Group LLC ("Traditum"), engaged in a pattern of manually placing a single or multiple fully-visible large order(s) on one side of the market while having a smaller order resting on the opposite side. In each instance, Traditum's employee manually deleted the large order(s) within seconds of the smaller order trading. Therefore, the large orders did not appear to be entered with the intent to trade.

The Subcommittee determined that Traditum may have violated Exchange Rule 4.01(a) in that Traditum had insufficient policies, procedures, and systems in place to train employees and monitor trading activity relative to Traditum's size of operations and activity on the Exchange.

PRODUCT

Cocoa Futures

PENALTY

In accordance with the terms of settlement, in which Traditum neither admitted nor denied the rule violation, Traditum paid a fine in the amount of \$90,000 and agreed to cease and desist from future violations of Rules 4.01(a).

EFFECTIVE DATE

September 17, 2018

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LINKED TO

2018-030 - Shay Caherly

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