

BEFORE THE BUSINESS CONDUCT COMMITTEE
OF THE
CBOE EXCHANGE, INC.

_____)	
In the Matter of:)	
)	
Lamberson Capital LLC)	File No. 18-0015
71 S. Wacker)	STAR No. 20170531327
Suite 2300)	
Chicago, IL 60606)	
)	
Subject)	
_____)	

DECISION ACCEPTING LETTER OF CONSENT

This proceeding was instituted by the Business Conduct Committee (the “Committee”) of the Cboe Exchange, Inc. (the “Exchange”) as a result of an investigation by the staff of the Exchange. In order to resolve this matter, the subject, Lamberson Capital LLC has submitted a Letter of Consent. Such Letter of Consent was submitted solely for the purposes of this proceeding without admitting or denying that a violation of Exchange Rules has been committed. With due regard to the stipulated facts and findings and the proposed sanction contained therein, the Committee believes it is appropriate to accept the Letter of Consent for File No. 18-0015 (STAR No. 20170531327) which is attached to and made a part of this Decision.

SO ORDERED
FOR THE COMMITTEE

Dated: August 30, 2018

By: /s/ Richard Bruder
Richard Bruder
Chairman
Business Conduct Committee

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71 S. Wacker)	STAR No. 20170531327
Suite 2300)	
Chicago, IL 60606)	
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Subject)	
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Letter of Consent

In order to resolve these proceedings pursuant to Cboe Exchange, Inc. (the “Exchange” or “Cboe”) Rule 17.3 – Expedited Proceeding, the Subject, Lamberson Capital LLC (“Lamberson” or the “Firm”), hereby submits this Letter of Consent in the above captioned matter. Only for purposes of this proceeding, and without admitting or denying that a violation of Exchange Rules has been committed, Lamberson consents to the Stipulation of Facts and Findings and Sanction set forth below.

Stipulation of Facts and Findings

1. During all relevant periods herein, Lamberson was an Exchange Trading Permit Holder registered to act as a Market-Maker.
2. During all relevant periods herein, Lamberson was acting as a registered Broker-Dealer.
3. During all relevant periods herein, Regulation SHO, Rule 200 – Definition of “short sale” and marking requirements, promulgated under the Securities Exchange Act of 1934, as amended, and Exchange Rules 4.2 – Adherence to Law and 4.24 – Supervision were in full force and effect.
4. From in or about October 2016 through in or about October 2017, Lamberson mismarked approximately 275 sell orders as “sell short” when the orders should have been marked as “sell long.”
5. From in or about October, 2016 through in or about October, 2017, Lamberson failed to enforce its Written Supervisory Procedures, designed to prevent and detect violations of Regulation SHO Rule 200.

6. From in or about October 2016 through in or about October 2017, Lamberson failed to supervise to assure compliance with Regulation SHO Rule 200 in conjunction with the conduct described above.
7. The acts, practices and conduct described in Paragraph 4 above constitute violations of Regulation SHO Rule 200 and Exchange Rule 4.2 by Lamberson, in that Lamberson mismarked approximately 275 sell orders as “sell short” when the orders should have been marked as “sell long.”
8. The acts, practices and conduct described in Paragraph 5 above constitute violations of Exchange Rule 4.24 by Lamberson, in that Lamberson failed to enforce its Written Supervisory Procedures, designed to prevent and detect violations of Regulation SHO Rule 200.
9. The acts, practices and conduct described in Paragraph 6 above constitute violations of Exchange Rule 4.2 by Lamberson, in that Lamberson failed to supervise to assure compliance with Regulation SHO Rule 200 in conjunction with the conduct described above.

Sanction: A censure and fine in the amount of \$7,500.

Subject acknowledges that it has read the foregoing Letter of Consent, that no promise or inducement of any kind has been made to it by the Exchange or its staff, and that this Letter of Consent is voluntary on its part.

Subject understands and acknowledges that the Committee’s decision in this matter will become part of its disciplinary record and may be considered in any future Exchange proceeding.

Subject also acknowledges that the Committee’s decision to accept or reject this Letter of Consent is final, and that it may not seek review thereof in accordance with Exchange Rule 17.3.

Dated: August 3, 2018

By: /s/ Lamberson Capital LLC
Lamberson Capital LLC