

BEFORE THE BUSINESS CONDUCT COMMITTEE
OF THE
CBOE FUTURES EXCHANGE LLC

In the Matter of:)	
)	
Deutsche Bank Securities Inc.)	CFE 19-0007
)	USFI 595/498
Subject.)	
)	

DECISION ACCEPTING LETTER OF CONSENT

This proceeding was instituted by the Business Conduct Committee (“BCC”) of the Cboe Futures Exchange LLC (“CFE”), following an investigation by CFE Regulation. In order to resolve this matter, Deutsche Bank Securities Inc. has submitted a CFE Rule 703 Letter of Consent for 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 proposed sanction, the BCC believes it appropriate to accept the Letter of Consent, summarized below, attached hereto, and made a part of this decision.

Applicable Rule: CFE Rule 410A – Open Interest

Sanction: \$22,500

Effective Date: January 16, 2020

So Ordered for the Committee

January 16, 2020

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

BEFORE THE BUSINESS CONDUCT COMMITTEE PANEL
OF THE
CBOE FUTURES EXCHANGE, LLC

_____)
In the Matter of:)
)
Deutsche Bank Securities Inc.,)
)
Subject.)
_____)

File No. CFE 19-0007

LETTER OF CONSENT

In order to resolve these proceedings pursuant to the CBOE Futures Exchange, LLC (“CFE” or “Exchange”) Rule 703, Expedited Proceeding, Deutsche Bank Securities Inc. (“DBSI”), hereby submits this Letter of Consent in the above captioned matter. For purposes of this proceeding and without admitting or denying that a violation of CFE Rules has been committed, DBSI consents to the Stipulation of Facts and Findings and the Sanction set forth below.

Stipulation of Facts and Findings:

1. During all relevant periods herein, DBSI was a CFE Trading Privilege Holder and Clearing Member.
2. During all relevant periods herein, CFE Rule 410A – Reporting Open Interest Information to the Clearing Corporation was in full force and effect, as follows, in relevant part:

Each Clearing Member shall report to the Clearing Corporation, on each Business Day, gross position adjustment information as necessary to identify the actual open interest in each Clearing Member account at the Clearing Corporation based on the trading activity for that Business Day, to the extent required by and in accordance with the rules of the Clearing Corporation.

3. In February 2019, DBSI failed to properly report open interest to the Options Clearing Corporation, resulting in overstatements of the February 2019 VX06 open interest for four days proximate to the contract’s final settlement date. This failure was due to a systems issue.
4. The conduct described above constitutes a violation of CFE Rule 410A.

Sanction: \$22,500 fine

DBSI acknowledges 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.

DBSI understands and acknowledges that the Business Conduct Committee's ("BCC") decision in this matter will become part of its disciplinary record and may be considered in any future Exchange proceeding.

DBSI also acknowledges the BCC's decision to accept or reject this Letter of Consent is final, and it may not seek review thereof in accordance with Exchange Rule 703.

Date

/s/Deutsche Bank Securities Inc.

Deutsche Bank Securities Inc.

Print Name

Title