



**CHICAGO MERCANTILE EXCHANGE  
NOTICE OF DISCIPLINARY ACTION**

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**FILE NO.:** CME 11-8613-BC

**MEMBER:** Traditum Group LLC

**CME RULE VIOLATION:** Rule 432. General Offenses

It shall be an offense:

- Q. to commit an act which is detrimental to the interest or welfare of the Exchange or to engage in any conduct which tends to impair the dignity or good name of the Exchange

**FINDINGS:** Pursuant to an offer of settlement in which Traditum Group LLC ("Traditum") neither admitted nor denied the rule violation upon which the penalty is based, on December 17, 2014, a Panel of the CME Business Conduct Committee ("Panel") found that it had jurisdiction over Traditum pursuant to Rules 400 and 402 as the conduct occurred while Traditum was a CME member. The Panel also found that on November 10, 2011, an automated trading system ("ATS") that Traditum purchased from a third party vendor and deployed malfunctioned and, during a period of approximately two minutes, executed 3,540 one-lot round-turn transactions in the December Canadian Dollar futures contract ("Canadian Dollar") for a total of 7,080 contracts. This level of trading caused a significant volume spike in the Canadian Dollar during this time period. The Panel concluded that Traditum violated Rule 432.Q.

**PENALTY:** In accordance with the settlement offer the Panel fined Traditum \$35,000. In coming to accept Traditum's offer of settlement, the Panel considered that Traditum reported the incident to the Exchange immediately, and has subsequently enhanced their automated trading system risk control policies.

**EFFECTIVE DATE:** December 19, 2014