

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

In the Matter of:	)	
	)	
Sun Trading LLC	)	File No. CFE 15-0017
	)	
	)	
Subject.	)	

**DECISION ACCEPTING LETTER OF CONSENT**

This proceeding was instituted by a Panel of the Business Conduct Committee (“Committee”) of CBOE Futures Exchange (“CFE”) as a result of an investigation by CFE Regulatory staff. In order to resolve this matter, Sun Trading LLC submitted a 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 the proposed sanction, contained therein, the Committee believes it is appropriate to accept the Letter of Consent, attached hereto and made a part of this decision.

**So Ordered for the Committee**

**December 14, 2015**

**By: /s/ Bruce Andrews**  
**Bruce Andrews**  
**Chairman**  
**Business Conduct Committee Panel**

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In the Matter of:	)	
	)	
Sun Trading LLC	)	File No. CFE 15-0017
	)	
	)	
	)	

**LETTER OF CONSENT**

In order to resolve these proceedings pursuant to the CBOE Futures Exchange, LLC (“CFE” or “Exchange”) Rule 703, Expedited Proceeding, Sun Trading LLC (“Sun”), 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 Exchange Rules has been committed, Sun 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, Sun was a CFE Trading Privilege Holder.
2. During all relevant periods herein, CFE Rule 608- Acts Detrimental was in full force and effect, as follows:

It shall be an offense to engage in any act detrimental to the Exchange, in conduct inconsistent with just and equitable principles of trade or in abusive practices, including without limitation, fraudulent, noncompetitive or unfair actions.

3. On March 20, 2015, Sun modified a hedging ratio strategy that inadvertently resulted in its system trading a disproportionate amount of VX futures contracts over a five second period. This aberration caused price and volume distortions in front and back month VX futures contracts, as well as a delay in trade acknowledgements to other market participants.
4. A Panel of the CFE Business Conduct Committee finds the acts, practices and conduct described above constitute a violation of Exchange Rule 608.

Sanction: \$50,000 fine

Sun 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.

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

Sun also acknowledges that the Business Conduct 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 703.

**Dated: December 2, 2015**

**By: /s/ Sun Trading LLC  
Sun Trading LLC**