



DISCIPLINARY DECISION

Cboe Exchange, Inc.

Star No. 20200651149-01/File No. USE-2333-01/URE-35-01

Belvedere Trading LLC

Pursuant to Exchange Rule 13.3, attached to and incorporated as part of this Decision is a Letter of Consent.

Applicable Rules

- Cboe Rules 3.6A and 3.30 – Qualification and Registration of Trading Permit Holders and Associated Persons.

Sanction

A censure and a monetary fine in the amount of \$5,000.

Effective Date

September 9, 2022

/s/ Greg Hoogasian

Greg Hoogasian, CRO, EVP

Cboe Exchange, Inc.
LETTER OF CONSENT
Star No. 2020065114901/File No. USE-2333/URE-35-01

In the Matter of:

Belvedere Trading LLC
10 South Riverside Plaza, Suite 2100
Chicago, IL 60606

Subject

Pursuant to the provisions of Cboe Exchange, Inc. (“Cboe” or the “Exchange”) Rule 13.3 – Expedited Proceeding, Belvedere Trading LLC (“Belvedere” or the “Firm”) submits this Letter of Consent for the purpose of proposing a settlement of the alleged rule violations described below.

The Firm neither admits nor denies that violations of Exchange Rules have been committed, and the stipulation of facts and findings described herein do not constitute such an admission.

BACKGROUND

1. During all relevant periods herein, Belvedere was acting as a registered Broker-Dealer and was an Exchange Trading Permit Holder. The Firm’s registrations remain in effect.
2. This matter originated from an examination conducted by FINRA’s Department of Market Regulation (Trading & Execution).

VIOLATIVE CONDUCT

Applicable Rules

3. During all relevant periods herein (as applicable), the following rules were in full force and effect: Exchange Rules 3.6A – Qualification and Registration of Trading Permit Holders and Associated Persons and 3.30 – Qualification and Registration of Trading Permit Holders and Associated Persons.¹
4. During all relevant periods herein (as applicable), Interpretation and Policy .08 to 3.6A and 3.30 required individual associated persons who: (i) supervised or monitored proprietary trading and/or market-making; (ii) supervised or trained those engaged in proprietary trading and/or market-making; and/or (iii) were designated as an officer, partner or director of a Trading Permit Holder or TPH

¹ Effective October 7, 2019, Cboe Rule 3.6A was re-numbered to Cboe Rule 3.30.

organization to qualify and register as a Securities Trader Principal (TP) in Web CRD and satisfy the prerequisite registration and qualification requirements. The qualification requirement for the Securities Trader Principal (TP) registration was the Series 24.

Failure to Qualify and Register

5. From in or about January 2019 through in or about June 2021, the Firm failed to qualify and register one associated person as a Securities Trader Principal (TP) with Cboe in Web CRD. Specifically, the associated person had responsibilities that required him to be qualified and registered as a Securities Trader Principal (TP) with the Exchange. The associated person did not have the Series 24 qualification between January 2019 and June 2021.
6. The acts, practices, and conduct described in Paragraph 5 constitute a violation of Exchange Rule 3.6A between January 2019 and October 6, 2019, and Exchange Rule 3.30 between October 7, 2019 and June 2021, by the Firm, in that the Firm failed to qualify and register one associated person as a Securities Trader Principal (TP) with Cboe in Web CRD.

SANCTIONS

7. The Firm does not have any prior relevant disciplinary history specifically related to qualification and registration of its associated persons.
8. In light of the alleged rule violations described above, the Firm consents to the imposition of the following sanctions:
 - a. A censure; and
 - b. A monetary fine in the amount of \$5,000.

If this Letter of Consent is accepted, the Firm acknowledges that it shall be bound by all terms, conditions, representations, and acknowledgements of this Letter of Consent, and, in accordance with the provisions of Exchange Rule 13.3, waives the right to review or to defend against any of these allegations in a disciplinary hearing before a Hearing Panel. The Firm further waives the right to appeal any such decision to the Board of Directors, the U.S. Securities and Exchange Commission, a U.S. Federal District Court, or a U.S. Court of Appeals.

The Firm waives any right to claim bias or prejudgment of the Chief Regulatory Officer (“CRO”) in connection with the CRO’s participation in discussions regarding the terms and conditions of this Letter of Consent, or other consideration of this Letter of Consent, including acceptance or rejection of this Letter of Consent.

The Firm agrees to pay the monetary sanction(s) upon notice that this Letter of Consent has been accepted and that such payment(s) are due and payable. The Firm specifically and voluntarily

waives any right to claim that it is unable to pay, now or at any time hereafter, the monetary sanction(s) imposed in this matter.

The Firm understands that submission of this Letter of Consent is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the CRO, pursuant to Exchange Rule 13.3. If the Letter of Consent is not accepted, it will not be used as evidence to prove any of the allegations against the Firm.

The Firm understands and acknowledges that acceptance of this Letter of Consent will become part of its disciplinary record and may be considered in any future actions brought by Cboe or any other regulator against the Firm.

The Firm understands that it may not deny the charges or make any statement that is inconsistent with the Letter of Consent. The Firm may attach a Corrective Action Statement to this Letter of Consent that is a statement of demonstrable corrective steps taken to prevent future misconduct. Any such statement does not constitute factual or legal findings by the Exchange, nor does it reflect the views of the Exchange or its staff.

The undersigned, on behalf of the Firm, certifies that a person duly authorized to act on its behalf has read and understands all of the provisions of this Letter of Consent and has been given a full opportunity to ask questions about it; that it has agreed to the Letter of Consent's provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein, has been made to induce the Firm to submit it.

Date: September 7, 2022
Date: _____

Belvedere Trading LLC

By:  _____

Name: Daniel Hoban
Name: _____

Title: CCO
Title: _____