cboe.com

DISCIPLINARY DECISION
Cboe Exchange, Inc.
File No. URE- 463-01
X-Change Financial Access, LLC

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

Applicable Rule(s)

- Cboe Rules 5.85 – Order and Quote Allocation, Priority, and Execution; 5.87 – Crossing Orders; and 5.91 – Floor Broker Responsibilities.

Sanction

A censure and a monetary fine in the amount of $30,000.

Effective Date

July 29, 2026

[redacted]

____

Greg Hoogasian, EVP, CRO

Cboe Exchange, Inc.
<u>LETTER OF CONSENT</u>
File No. URE-463-01

In the Matter of:

X-Change Financial Access, LLC
222 W Adams Street, Suite 450
Chicago, IL 60606

Subject

Pursuant to the provisions of Cboe Exchange, Inc. ("Cboe" or the "Exchange") Rule 13.3 – <u>Expedited Proceeding</u>, X-Change Financial Access, LLC ("XFA" 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 stipulations described herein do not constitute such an admission.

<u>BACKGROUND</u>

1. During all relevant periods herein, the Firm was acting as a registered Broker-Dealer and was an Exchange Member. The Firm's registrations remain in effect.

<u>VIOLATIVE CONDUCT</u>

<u>Applicable Rules</u>

2. During all relevant periods herein, the following laws and rules were in full force and effect: Exchange Rules 5.85 – <u>Order and Quote Allocation, Priority, and Execution</u>, 5.87 – <u>Crossing Orders</u>, and 5.91 – <u>Floor Broker Responsibilities</u>.

3. During all relevant periods herein, Exchange Rule 5.85 provided in part that "[i]f a Floor Broker . . . represents an order to a trading crowd on the Exchange's trading floor, it executes against bids and offers from other ICMPs, including on-floor Market-Makers, as follows: . . . [b]ids and offers with the highest bid and lowest offer have priority . . . [and] if there are two or more bids (offers) at the same price, they are prioritized in the sequence in which they are made (i.e., in time priority) . . . ."

4. During all relevant periods herein, Exchange Rule 5.87 provided in part that "[a] Floor Broker who holds orders to buy and sell the same option series may cross such orders . . . at such higher bid or lower offer by announcing by public outcry that he is crossing and giving the quantity and price" if ICMPs are solicited and decline to take the Floor Broker's bid or offer.

5. During all relevant periods herein, Exchange Rule 5.91 provided in part that a Floor Broker handling an order "must use due diligence to execute the order at the best price or prices available to him [including] the immediate and continuous representation at the trading station where the applicable class trades of the following types of orders: market orders . . . ."

<u>Trading Floor Violation</u>

6. On or about May 8, 2025 (the "Review Date"), XFA (by and through an employee Floor Broker) violated Exchange Rules by trading through the market provided by three In-Crowd Market Participants ("ICMPs") for VIX May 21, 2025 $35.00 Calls, May 21, 2025 $75.00 Calls, and July 16, 2025 $35.00 Calls (the "Structured Spread").

7. The Firm announced the Structured Spread to the VIX Trading Crowd, received a price in response, failed to cancel the Structured Spread order, then subsequently traded the Structured Spread as an Automated Improvement Mechanism ("AIM") auction, fully crossed, at an inferior price compared to the market provided by the ICMPs.

8. The acts, practices, and conduct described in Paragraphs 6 and 7 constitute violations of Exchange Rules 5.85, 5.87, and 5.91 by the Firm, in that the Firm traded through a market provided by ICMPs who had expressed interest in the order, and exceeded any applicable permissible participation entitlement for the order without first determining whether the ICMP interest had been exhausted.

<u>SANCTIONS</u>

9. The Firm has no relevant formal disciplinary history.

10. In light of the alleged rule violation described above, the Firm consents to the imposition of the following sanctions:

    a. A censure; and

    b. A monetary fine in the amount of $30,000.

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 the Exchange or any other regulator against the Firm. The Letter of Consent will be published on a website maintained by the Exchange.

The Firm understands that it may not deny the charges or make any public statement that is inconsistent with the Letter of Consent. The Firm may not take any position in any proceeding brought by or on behalf of the Exchange, or to which the Exchange is a party, that is inconsistent with any part of this Letter of Consent. Nothing in this provision affects the Firm's (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which the Exchange is not a party. 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 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: 07/28/2026

X-Change Financial Access, LLC

B[redacted]

Name: Andrew Geye

Title: CEO - Securities

By: [redacted]

[redacted]