



433 W Van Buren St.  
Chicago, IL  
60607  
United States

cboe.com

## **DISCIPLINARY NOTICE**

### **CFE RULE 714 - Imposition of Fines for Minor Rule Violations**

October 30, 2024

**Via Electronic Mail:** Gregory.dumark@nomura.com

Mr. Gregory Dumark  
Chief Compliance Officer  
Nomura Securities International Inc  
309 W 49<sup>th</sup> Street  
New York, NY 10019

Re: Minor Rule Violation Notice  
Exchange Matter ID: USFI-2316<sup>1</sup>

Dear Mr. Dumark :

Pursuant to Cboe Futures Exchange, LLC ("CFE") Rule 714 - Imposition of Fines for Minor Rule Violations, Nomura Securities International Inc ("NSI" or the "Firm") has been charged with the following rule violation and assessed a fine in the amount indicated below.

### **CHARGE**

#### **Rule Violation: CFE Rule 403(b)(xi)– Customer Type Indicator ("CTI")**

During the period September 2023 to August 2024, NSI violated CFE Rule 403 (b)(xi). Specifically, NSI submitted multiple orders to the Exchange with an inaccurate Customer Type Indicator ("CTI") code.

This is a second violation of Rule by NSI within a rolling twelve (12) month period.<sup>2</sup>

**Summary Fine Amount:** \$2,500 Fine

NSI should be aware that continued violations of CFE Rule 403(b)(xi) may result in further disciplinary action such as an escalation of Rule 714 summary fines or a formal disciplinary proceeding under Chapter 7 of CFE Rules.

### **CONTESTING THE VIOLATION**

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<sup>1</sup> CFE Enforcement File No. URE-361-09

<sup>2</sup> NSI received a Letter of Caution (first violation) under CFE Rule 714 for a CFE Rule 403(b)(xi) violation on September 22, 2023, for inaccurate CTI codes from June 1, 2021 through November 30, 2022. See USFI-1827.

The Firm may contest the violation(s) before a panel of the CFE Business Conduct Committee (“BCC”) by filing an answer within 30 days of this Disciplinary Notice, by or before November 29, 2024, in the form provided in Rule 705 (“Answer”). The Firm shall file its Answer and a copy of this Notice to the following:

Cboe Global Markets, Inc.  
C/O Sarah McDowell, Chief Enforcement Counsel  
433 W. Van Buren St  
Chicago, IL 60607  
[smcdowell@cboe.com](mailto:smcdowell@cboe.com)

The Answer must specify whether a hearing is requested; if a hearing is not specifically requested, the review will be based on written submissions. In any such disciplinary proceeding, the BCC may impose any one or more of the disciplinary sanctions authorized by the Rules of the Exchange.

In addition, in accordance with CFE Rule 714(c)(ii), if the fine is upheld, the BCC shall impose a forum fee against the Firm in the amount of one hundred dollars (\$100) if the determination was reached without a hearing, or in the amount of three hundred dollars (\$300) if a hearing was conducted. Please see Rule 714(c) for further information.

### **WAIVER**

If the Firm declines to file an Answer as provided above, the Firm will waive the right to contest the violation. If the right is waived an Answer, the determination that the Firm violated the above referenced rule(s) shall become final and will no longer be subject to review, and payment is due. If an Answer is not provided, the Firm’s payment must be received within 30 days from the date of this letter. Please forward your payment to either:

**Please remit electronic payments to:**

JP Morgan Chase Bank, N.A.  
Wire Routing Number: 021000021  
ACH Routing Number: 071000013  
SWIFT Code: CHASUS33  
Account Name: Cboe Global Markets, Inc.  
Account Number: 887294064

**Please mail payments to:**

Cboe Global Markets, Inc.  
28851 Network Place  
Chicago, IL 60673-1288

### **FINE REPORTING REQUIREMENTS**

After the determination of the violation and fine become final, the Exchange is required to report this decision to the BASIC system administered by the National Futures Association (NFA).

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,



Sarah McDowell  
VP, Chief Enforcement Counsel CFE

cc: Heather Embrey (Cboe)  
Jessica Anello (Cboe)  
Karri Kottka (NSI)