



DISCIPLINARY DECISION

**Cboe Exchange, Inc.
File No. URE-316-01
Wolverine 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 Rule 6.1 – Report Transactions to the Exchange
- Cboe Rule 8.16 – Supervision

Sanction

A censure and a monetary fine in the amount of \$19,000.

Effective Date

July 16, 2024

/s/ Greg Hoogasian

Greg Hoogasian, CRO, EVP

Cboe Exchange, Inc.
LETTER OF CONSENT
File No. URE-316-01

In the Matter of:

Wolverine Trading, LLC
175 W. Jackson Blvd.
Chicago, IL 60604,

Subject

Pursuant to the provisions of Cboe Exchange, Inc. ("Cboe" or the "Exchange") Rule 13.3 – Expedited Proceeding, Wolverine Trading, LLC (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.

BACKGROUND

1. During all relevant periods herein and during on or about June 12, 2023, through on or about January 31, 2024, (the "Review Period"), the Firm was acting as a registered Broker-Dealer and was an Exchange Trading Permit Holder registered to conduct a Market Maker business on the Exchange. The Firm's registrations remain in effect.

VIOLATIVE CONDUCT

Applicable Rules

2. During all relevant periods herein, the following rules were in full force and effect: Exchange Rules 6.1 – Report Transactions to the Exchange and 8.16 – Supervision.
3. During all relevant periods herein, Exchange Rule 6.1 provided, in relevant part: "A participant in each transaction to be designated by the Exchange must report or ensure the transaction is reported to the Exchange within 90 seconds of the execution in a form and manner prescribed by the Exchange so that the trade information may be reported to time and sales reports. (1) Late Reports. Transactions not reported within 90 seconds after execution in accordance with this Rule shall be designated as late. A pattern or practice of late reporting without exceptional circumstances may be considered conduct inconsistent with just and equitable principles of trade and subject to discipline..."

4. During all relevant periods herein, Exchange Rule 8.16 provided, in relevant part: "Each Trading Permit Holder shall establish, maintain, and enforce written supervisory procedures, and a system for applying such procedures, to supervise the types of business in which the Trading Permit Holder engages and to supervise the activities of all associated persons. The written supervisory procedures and the system for applying such procedures shall reasonably be designed to prevent and detect violations of applicable securities laws and regulations, and applicable Exchange rules."

Timely Reporting

5. During the Review Period, the Firm failed to report 156 transactions¹ executed on the floor within 90 seconds after execution.
6. The acts, practices, and conduct described in Paragraph 5 constitute violations of Exchange Rule 6.1 by the Firm, in that the Firm failed to timely report transactions executed on the floor.

Written Supervisory Procedures

7. During the Review Period, the Firm failed to establish, maintain, and enforce written supervisory procedures ("WSPs"), and a system for applying such procedures, reasonably designed to prevent and detect violations of applicable Exchange rules that require transactions be reported to the Exchange within 90 seconds of the execution in a form and manner prescribed by the Exchange. In particular, the Firm's WSPs only restated the language of Cboe Rule 6.1 without any more specificity or detail as to how the Firm ensures compliance with Cboe Rule 6.1.
8. The acts, practices and conduct described in Paragraph 7 constitute violations of Exchange Rule 8.16 by the Firm, in that the Firm failed to implement, maintain, and enforce WSPs, and a system for applying such procedures, reasonably designed to prevent and detect violations of the timely transaction reporting requirement set forth in Exchange Rule 6.1.

SANCTIONS

9. 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 \$19,000.

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

¹ The 156 instances were taken from a sample of exceptions generated during the Review Period that were reviewed, and as such, represent the minimum number of violative transactions during the Review Period.

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 prejudice 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.

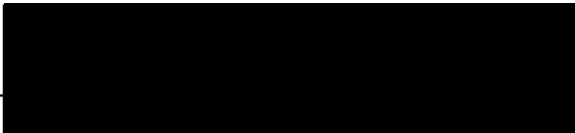
The Firm understands and acknowledges that acceptance of this Letter of Consent will become part of its disciplinary record and may be considered in any future actions brought by the Exchange or any other regulator against the Firm.

Subject understands that he may not deny the charges or make any public statement that is inconsistent with the Letter of Consent. Subject may not take any position in any proceeding brought on or 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 Subject'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. Subject 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: 7/10/24

Wolverine Trading, LLC

By: 

Name: Casey McMahon

Title: Chief Compliance Officer