

**NORTH AMERICAN DERIVATIVES EXCHANGE, INC.**  
**NOTICE OF DISCIPLINARY ACTION**

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**FILE NO.:** TPI\_2017\_030(a)

**MEMBER:** Ashley Pomerville

**NADEX RULES:**

**RULE 5.19 PROHIBITED TRANSACTIONS AND ACTIVITIES**

(b) No Person shall enter into or attempt to enter into any non-competitive trade on the Market, including any accommodation trade or any trade that has been directly or indirectly prearranged. For example, a Member may not agree in advance with another Member that one of the Members will enter an order and the other Member will attempt to trade against that order by timing the submission of orders or otherwise.

**FINDINGS:** An investigation into trading activity conducted by Ashley Pomerville ("Pomerville") revealed that Pomerville had prearranged multiple transactions on the Exchange from November 15, 2017 through November 22, 2017 with another Nadex Member. During the course of the investigation, Pomerville fully cooperated and acknowledged having discussions with the other Nadex participant for the sole purpose of entering orders on the Exchange that would trade opposite one another. Accordingly, Pomerville was found to have violated Rule 5.19(b), which prohibits entering into any non-competitive trade on the Exchange, when she discussed and effectuated prearranged trades with another Nadex Member.

**PENALTY:** As a result of the violation, Ashley Pomerville was fined \$500.00.

**EFFECTIVE DATE:** December 19, 2018