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

FILE NO.: TPI_2024_005

MEMBER: Hannah Ogunyinka

NADEX RULES:

NADEX MEMBERSHIP AGREEMENT

Member Representations, Section (d):

You and, if relevant, Your employees and agents will not trade or otherwise act on behalf of any other person or entity (whether or not a Member) in placing orders on the crypto.com | Derivatives North America System, including by allowing any person not disclosed on the Membership Application to have an economic interest in the trades placed by the Member;

Member Acknowledgements and Authorizations, Section (a):

[. . .] You may not give control over Your account to any other person or entity and You may not control the account of any other Member. You shall maintain the confidentiality of Your Access Materials and prevent the unauthorized use of Your Access Materials at all times. [. . .]

Member Acknowledgements and Authorizations, Section (h):

You acknowledge and agree that You will, following a request by crypto.com | Derivatives North America, promptly provide to crypto.com | Derivatives North America financial or other information as crypto.com | Derivatives North America may reasonably request or as may be required for crypto.com | Derivatives North America to respond to a request for information from the Commodity Futures Trading Commission ("CFTC") or other regulatory or judicial bodies.

RULE 3.3 MEMBER OBLIGATIONS

- (a) Each Member and any Authorized Trader(s) thereof, must comply with these Rules, applicable provisions of the Commodity Exchange Act, and relevant Commission regulations. Each Member and any Authorized Trader(s) thereof must also cooperate promptly and fully with Nadex, its agents, and/or the Commission in any investigation, call for information, inquiry, audit, examination, or proceeding. Such cooperation shall include providing Nadex with access to information on the activities of such Member

and/or Authorized Trader in any referenced market that provides the underlying prices for any Nadex market. [. . .]

RULE 5.2 TRADING MEMBER AND AUTHORIZED TRADER ACCESS TO NADEX

- (e) Each Trading Member will be responsible for protecting its ID and password, and with respect to an Entity Trading Member, the ID(s) and password(s) of its Authorized Trader(s), from improper disclosure. In addition, a Trading Member may not knowingly or negligently permit any Person not authorized by Nadex and by the Trading Member to use the ID and password to access the secure portion of the Nadex website. [. . .]

RULE 5.19 PROHIBITED TRANSACTIONS AND ACTIVITIES

- (g)(i) No individual Trading Member shall trade for a person or entity other than itself and no Authorized Trader of an Entity Trading Member shall trade for a person or entity other than the Entity Trading Member for whom that Person is an Authorized Trader.

FINDINGS: On February 20, 2024, the Nadex Compliance Department sent Hannah Ogunyinka an Account Inquiry letter requesting, among other things, general background information, source of funds information, banking statements and details regarding order and trading activity. Hannah Ogunyinka failed to comply with this investigation, when she failed to respond to the inquiry, and was notified that an Investigation had been opened on April 8, 2024. Further, the Compliance Department found Hannah Ogunyinka allowed a third party to access and have a direct economic interest in the activity and trading in her Nadex account.

Based on Nadex's investigation, the Compliance Department determined that Hannah Ogunyinka violated Rule 3.3(a) and Member Acknowledgements and Authorizations, Section (h) of the Nadex Membership Agreement when she failed to cooperate with the Compliance Department's inquiry regarding these matters. Further, Hannah Ogunyinka violated Rule 5.2(e) and 5.19(g)(i) Nadex Membership Agreement, Member Representations Section (d), when she allowed a third party to access and have a direct economic interest in the activity and trading in her Nadex account.

PENALTY: By settlement agreement, in which Hannah Ogunyinka neither admitted nor denied the findings or conclusions of the investigation, Hannah Ogunyinka has been assessed a \$4,500.00 fine. Additionally, Hannah Ogunyinka's Nadex Membership has been revoked, her account terminated, and she has been permanently banned from trading on Nadex Markets, either directly for her own account or through an intermediary, or as an authorized trader on behalf of any other account.

EFFECTIVE DATE: November 4, 2024