

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

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**FILE NO.:** TPI\_2018\_003(g)

**MEMBER:** Dumitre Ungureanu

**NADEX RULES:**

**NADEX MEMBERSHIP AGREEMENT - MEMBER ACKNOWLEDGEMENTS AND  
AUTHORIZATIONS**

(h) You acknowledge and agree that You will, following a request by Nadex, promptly provide to Nadex financial or other information as Nadex may reasonably request or as may be required for Nadex 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 . . . .

**FINDINGS:** In April 2018, the Compliance Department contacted Dumitre Ungureanu ("Ungureanu") requesting that he provide information regarding his trading activity on Nadex, general trading knowledge and background, and relevant financial information. Ungureanu responded to certain inquiries and requests for information; however, he failed to provide pertinent documents relevant to a pending investigation. Based on Nadex's investigation, the Compliance Department concluded that Ungureanu violated the Nadex Membership Agreement Section (h) and Nadex Rule 3.3(a) when he failed to fully respond to, and/or cooperate with, the Compliance Department's request for information.

**PENALTY:** As a result of his non-compliance with the Nadex Membership Agreement Section (h), and Nadex Rule 3.3(a), Ungureanu has been fined \$1,750.00. Additionally, Ungureanu's membership has been revoked and he has been permanently banned from trading on the Nadex markets by any means.

**EFFECTIVE DATE:** April 22, 2019