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

FILE NO.: INQ_2021_014

MEMBER: Mylyn Streeks

NADEX RULES:

NADEX MEMBERSHIP AGREEMENT

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 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.

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 Nadex System, including by allowing any person not disclosed on the Membership Application to have an economic interest in the trades placed by the Member.

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)(2) No individual or Entity Trading Member may deposit funds, or allow funds to be deposited into their Nadex account from any bank account or debit card not held in the same name as their Nadex account.
- (o) No Member shall deposit funds into its Nadex account from an account which does not hold sufficient funds at the time of deposit, and at the time the deposit is presented by Nadex for payment.
- (q) No Member shall allow its settlement account balance to become negative by any means. In the event that a Member's settlement account balance becomes negative, the Member must immediately deposit additional funds to correct the deficiency. Any Member whose settlement account carries a negative balance for 30 days or more is subject to summary termination of Membership.

FINDINGS: On June 17, 2021, Nadex Compliance sent Mylyn Streeks ("Streeks") an Account Inquiry requesting information including, but not limited to her deposit patterns, prior trading experience, and sources of funding. On July 26, 2021, after being granted multiple extensions to respond, she responded to the Account Inquiry and admitted that she allowed another Nadex Member, to access, fund, and trade in her Nadex account.

Accordingly, the Compliance Department has concluded that she violated Nadex Rule 5.2(e), Rule 5.19(g)(2), and Member Acknowledgements and Authorizations, Section (a) of the Nadex Membership Agreement. Also, she violated the Nadex Membership Agreement, Member Representations, Section (d) when she allowed another Nadex Member to have a third-party economic interest in her Nadex account when, by her own admission, she allowed a third party to access, fund, and trade her account. Additionally, by bouncing multiple ACH deposits for non-sufficient funds, she violated Nadex Rule 5.19(o). By allowing her settlement account balance to become negative, she violated Nadex Rule 5.19(q). Finally, by failing to timely respond to Nadex Compliance's requests for information, she violated Nadex Rule 3.3(a) and Member Acknowledgements and Authorizations, Section (h) of the Nadex Membership Agreement.

PENALTY: As a result of the aforementioned violations, the Nadex Compliance Department has deemed it appropriate Mylyn Streeks' Nadex Membership be been revoked, her account terminated, and she be 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: February 25, 2022