NORTH AMERICAN DERIVATIVES EXCHANGE, INC. NOTICE OF DISCIPLINARY ACTION

FILE NO.: INQ_2023_004

MEMBER: Arantxa Sabrina Valderrama-Barros

NADEX RULES:

RULE 5.19 PROHIBITED TRANSACTIONS AND ACTIVITIES

- (k) No Person shall intentionally provide misleading, erroneous, or fraudulent information to Nadex on a membership application or otherwise.
- (p) No Member shall make a false representation to a third party regarding any deposit made into that Member's Nadex account which would result in a chargeback or stop payment of funds to the Member's account.
- **FINDINGS:** The Nadex Compliance Department after conducting an investigation found that Arantxa Sabrina Valderrama-Barros made a false representation on her Nadex application relating to a pending U.S. Federal case. Further, the Compliance Department found that Arantxa Sabrina Valderrama-Barros made a false representation to her bank which resulted in a chargeback to her Nadex account.

Based on Nadex's investigation, the Compliance Department determined that Arantxa Sabrina Valderrama-Barros violated Nadex Rule 5.19(k) for making a false representation on her Nadex Application and violated Nadex Rule 5.19(p) by making a false representation to her bank which resulted in a chargeback to her Nadex account.

PENALTY: As a result of the aforementioned violations, the Nadex Compliance Department has deemed it appropriate that Arantxa Sabrina Valderrama-Barros's Nadex Membership has been revoked, her account terminated, and she has been permanently banned from trading on Nadex Markets, either directly for her own account or through an intermediary, or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: March 22, 2024