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

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**FILE NO.:** TPI\_2018\_012(a)

**MEMBER:** Prabha George

**NADEX RULES:**

**NADEX MEMBERSHIP AGREEMENT**

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.

**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. . . .

**FINDINGS:** In June 2018, the Compliance Department contacted Prabha George ("George") requesting, among other things, general background information, source of funds information and details regarding her order and trading activity. Despite a follow-up communication providing George with an extension to respond to the request for information, she failed to comply and/or respond to the inquiry letter.

The Compliance Department concluded that George violated Member Acknowledgements and Authorizations, Section (h) of the Nadex Membership Agreement and Exchange Rule 3.3(a) by wholly failing to cooperate with this investigation.

**PENALTY:** As a result of the aforementioned violations, Prabha George has been assessed a \$5,000.00 fine, and her Nadex Membership has been revoked, her account terminated, and she has been permanently banned from trading on Nadex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, through an intermediary, or as an authorized trader on behalf of any other account.

**EFFECTIVE DATE:** April 22, 2020