

BEFORE THE BUSINESS CONDUCT COMMITTEE PANEL
OF
CBOE FUTURES EXCHANGE, LLC

In the Matter of:)	
)	
Rosenthal Collins Group LLC)	
216 W. Jackson Blvd.)	File No. CFE 14-0004
Suite 400)	
Chicago, Illinois 60661)	
)	
Respondent)	
)	

DECISION ACCEPTING OFFER OF SETTLEMENT

This proceeding was instituted by the Business Conduct Committee Panel (the “Committee”) of CBOE Futures Exchange, LLC (the “Exchange” or “CFE”) as a result of an investigation by the staff of the Exchange, which indicated that there was probable cause for finding a violation within the disciplinary jurisdiction of the Exchange. In accordance with that determination, the Committee directed the issuance of a Statement of Charges (“Statement of Charges”). Pursuant to Exchange Rule 708, the respondent (“Respondent”), Rosenthal Collins Group LLC (“RCG”), submitted an offer of settlement (“Offer of Settlement”).

In submitting the Offer of Settlement, the Respondent neither admitted nor denied the violations alleged in the Statement of Charges.

The Respondent has agreed that the determination of the Committee to accept the Offer of Settlement shall constitute a final Decision, and, as provided in Exchange Rule 708, the Respondent may not seek review thereof.

The Respondent understands and acknowledges that the Committee’s decision in this matter will become part of its disciplinary record and may be considered in any future Exchange proceeding.

With due regard to the particulars of this matter, the Committee believes it is appropriate to accept the Respondent’s Offer of Settlement based on the following stipulated facts and findings and thereby to impose the sanction specified below.

FACTS

1. During all relevant periods herein, RCG was a CFE Trading Permit Holder.
2. During all relevant periods herein, CFE Rule 412B- Reportable Positions was in full force and effect.

3. Pursuant to CFE Rule 412B – Trading Privilege Holders shall report to the Exchange in a form and manner prescribed by the Exchange reportable positions and related information relating to Exchange Contracts that Trading Privilege Holders are required to report to the Commission pursuant to Commission regulations.
4. During the approximate period from on or about November 7, 2012 through in or about February 20, 2013, on numerous dates, RCG failed to submit in a form and manner prescribed by the Exchange reportable positions and related information. Specifically, RCG failed to transmit reportable position information via the Securities Industry Automation Corporation (“SIAC”). In addition, RCG failed to submit to CFE a timely CFTC Form 102 – Reportable Account Identification (related information) no later than three business days of the establishment of the Reportable Position.¹

FINDINGS

The acts, practices and conduct described in Paragraph 4 above constitute a violation of CFE Rule 412B by RCG, in that RCG, on numerous dates, failed to submit in a form and manner prescribed by the Exchange reportable positions and related information.

SANCTION

The sanction to be imposed shall consist of a \$25,000 fine and a censure.

ORDER

ACCORDINGLY IT IS ORDERED THAT, the Respondent, Rosenthal Collins Group LLC, shall be and hereby is censured and fined in the amount of \$25,000.

**SO ORDERED
FOR THE COMMITTEE**

Dated: October 6, 2014

**By: /s/ Bruce Andrews
Bruce Andrews
Chairman
Business Conduct Committee Panel**

¹ RCG filed CFTC Form 102 with CFE on December 21, 2012.