

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

_____)	
In the Matter of:)	
)	
Eagle Seven LLC,)	File No. CFE 15-0004
)	
Subject.)	
_____)	

DECISION ACCEPTING LETTER OF CONSENT

This proceeding was instituted by a Panel of the Business Conduct Committee (“Committee”) of CBOE Futures Exchange (“CFE”) as a result of an investigation by CFE Regulatory staff. In order to resolve this matter, Eagle Seven LLC has submitted a Letter of Consent for purposes of this proceeding without admitting or denying that a violation of Exchange Rules has been committed. With due regard to the stipulated facts and findings and the proposed sanction, contained therein, the Committee believes it is appropriate to accept the Letter of Consent, attached hereto and made a part of this decision.

So Ordered for the Committee

August 26, 2015

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

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

_____)
In the Matter of:)
)
Eagle Seven LLC,)
)
)
_____)

File No. CF 15-0004

LETTER OF CONSENT

In order to resolve these proceedings pursuant to the CBOE Futures Exchange, LLC ("CFE" or "Exchange") Rule 703, Expedited Proceeding, Eagle Seven LLC ("Eagle Seven") hereby submit this Letter of Consent in the above captioned matter. For purposes of this proceeding and without admitting or denying that a violation of Exchange Rule has been committed, Eagle Seven consents to the Stipulation of Fact and Finding and the Sanction set forth below.

Stipulation of Facts and Findings:

1. During all relevant periods herein Eagle Seven was a CFE Trading Privilege Holder.
2. During all relevant periods herein CFE Rule 608- Act Detrimental to the Exchange; Acts Inconsistent with Just and Equitable Principle of Trade; Abusive Practice was in full force and effect, as follows:

It shall be an offense to engage in any act detrimental to the Exchange, in conduct inconsistent with just and equitable principles of trade or in abusive practice, including without limitation fraudulent, noncompetitive or unfair actions.

3. On several occasions during March and April 2014, Eagle Seven entered orders in the CBO Volatility Index future prior to the pre-open session that were rejected by the Exchange.
Eagle Seven knew or should have known that the order would be rejected.
4. The conduct described above constitutes a violation of Exchange Rule 608 by Eagle Seven in that it was inconsistent with just and equitable principles of trade.

Sanction: \$15,000 fine

Eagle Seven acknowledges that it has read the foregoing Letter of Consent that no promise or inducement of any kind has been made to it by the Exchange or its staff, and that this Letter of Consent is voluntary on its part.

Eagle Seven understands and acknowledges that the Business Conduct Committee's ("Committee") decision in this matter will become part of its disciplinary record and may be considered in any future Exchange proceeding.

Eagle Seven also acknowledges that the Committee's decision to accept or reject this Letter of Consent is final, and that it may not seek review thereof in accordance with Exchange Rule 703.

Dated: June 8, 2015

By: /s/ Eagle Seven LLC

Eagle Seven LLC