

BEFORE THE BUSINESS CONDUCT COMMITTEE
OF THE
CBOE FUTURES EXCHANGE

_____)	
In the Matter of:)	
)	
RBC Capital Markets, LLC,)	CFE 18-0002
)	ENF JCT 109628
Subject.)	INV JCT 109553
)	

DECISION ACCEPTING LETTER OF CONSENT

This proceeding was instituted by a Panel of the Business Conduct Committee ("BCC") of the Cboe Futures Exchange ("CFE") as a result of an investigation by CFE Regulation. In order to resolve this matter, RBC Capital Markets, 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 BCC believes it is appropriate to accept the Letter of Consent, attached hereto, and made a part of this decision.

So Ordered for the Committee

June 13, 2018

s/ Richard Bruder
Richard Bruder
Chairman
Business Conduct Committee Panel

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

_____)	
In the Matter of:)	
)	
RBC Capital Markets, LLC)	18-0002
("RBCCM"))	Enf ICT 109628
)	JCT 109553
Subject.)	
	.)	

LETTER OF CONSENT

In order to resolve these proceedings pursuant to Cboe Futures Exchange, LLC ("CFE") Rule 703, Ex12edited Proceeding, RBCCM hereby submits this Letter of Consent to the Business Conduct Committee ("BCC"). For purposes of this proceeding and without admitting or denying that a violation of CFE Rules has been committed, RBCCM consents to the Stipulation of Facts and Findings and the Sanction set forth below.

Stipulation of Facts and Findings:

1. During all relevant periods herein, RBCCM was a CFE Trading Privilege Holder and Clearing Member.
2. During all relevant periods herein, CFE Rules 410A - Reporting Open Interest, 412B(a) - Ownership and Control Reports and 609 - Supervision were in full force and effect, as follows:

Rule 410A: Each Clearing Member shall report to the Clearing Corporation, on each Business Day, gross position adjustment information as necessary to identify the actual open interest in each Clearing Member account at the Clearing Corporation based on the trading activity for that Business Day, to the extent required by and in accordance with the rules of the Clearing Corporation. Gross position adjustment information is not required to be reported to the Clearing Corporation pursuant to this Rule 410A for Market Maker accounts at the Clearing Corporation or for transactions with respect to which a Trading Privilege Holder has designated as part of the applicable Order submission to the Exchange whether the transaction is opening or closing.

Rule 412B(a): Each Trading Privilege Holder shall, in a form and manner prescribed by the Exchange: (i) concurrently file with the Exchange a copy of all CFTC Form 102 (including CFTC Form 102A and CFTC Form 102B) and CFTC Form 71 submissions (including any attachments, related submissions, or related information) relating to

Exchange Contracts that each Trading Privilege Holder is required to report to the Commission pursuant to Commission regulations; and (ii) concurrently report to the Exchange reportable positions in Exchange Contracts that each Trading Privilege Holder is required to report to the Commission pursuant to Commission regulations.

Rule 609: Each Trading Privilege Holder shall be responsible for establishing, maintaining and administering reasonable, written supervisory procedures to ensure that its Related Parties and Customers comply with Applicable Law, the Rules of the Exchange and the Rules of the Clearing Corporation. A Trading Privilege Holder may be held accountable for the actions of its Related Parties. In addition, each Responsible Trader shall be responsible for supervising the Related Parties of the Trading Privilege Holder represented by it, and may be held accountable for the actions of such Related Parties.

3. On numerous dates from May 2016 through May 2017, due to a third party service provider programming error and a failure to follow its own written procedures, RBCCM reported inaccurate Open Interest in various VX Weekly contracts, resulting in overstatements of overall Exchange Open Interest. In addition, on numerous dates between December 2016 and August 2017, due to a third party service provider inputting incorrect reportable levels and a failure to follow its own written procedures, RBCCM failed to report Large Trader positions in various VX Weekly contracts.
4. The conduct described above constitutes violations of CFE Rules 410A, 412B(a) and 609.

Sanction: A fine of \$50,000

RBCCM acknowledges that it has read the foregoing Letter of Consent, that no promise or inducement of any kind has been made by CFE, and that this Letter of Consent is voluntary.

RBCCM understands and acknowledges that the BCC's decision in this matter will become part of its disciplinary record and may be considered in any future proceeding.

RBCCM also acknowledges that the BCC's decision to accept or reject this Offer of Settlement is final, and that it may not seek review thereof in accordance with CFE Rule 708.

Date: April 20, 2018

s/RBC Capital Markets, LLC

RBC Capital Markets, LLC