

BLOOMBERG SEF LLC

NOTICE OF DISCIPLINARY ACTION

PARTICIPANT: JPMorgan Chase Bank, National Association ("**JPMC**")

RULE VIOLATION: RULE 531.A Block Trades

BSEF Rule 531.A (d) – A Block Trade executed outside the SEF Platform by a Participant must be reported to the SEF operated by BSEF. A Block Trade must be reported to the SEF operated by BSEF by one Counterparty (or a Participant acting on behalf of such Counterparty) and confirmed by the other Counterparty (or a Participant acting on behalf of such Counterparty) as soon as practicable after its execution, but may not be submitted any later than 10 minutes after the execution of the Block Trade. Each Block Trade must state the time of execution to the nearest second. BSEF shall have the right not to accept any transaction that does not satisfy the conditions set forth in this Rule.

FINDINGS: On August 6, 2024, JPMC submitted to the BSEF a Block Trade in the CDX.NA.HY S42 5y swap ("CXPHY542") with another Participant. Upon inquiry, however, the Participants indicated that they bilaterally agreed to the Block Trade approximately an hour earlier.

BSEF Rule 531.A (d) requires that a Block Trade must be reported to the SEF operated by BSEF by one Counterparty (or a Participant acting on behalf of such Counterparty) and confirmed by the other Counterparty (or a Participant acting on behalf of such Counterparty) as soon as practicable after its execution, but may not be submitted any later than 10 minutes after the execution of the Block Trade. JPMC violated BSEF Rule 531.A (d) by submitting the referenced Block Trade to BSEF more than 10 minutes after the time the Participants agreed to the terms of the Block Trade.

PENALTY: On December 19, 2024, pursuant to Rule 621, a summary fine in the amount of \$1,250 was assessed against JPMC for its violation of BSEF Rule 531.A (d).

EFFECTIVE DATE: January 9, 2025