

**LEDGERX DCM
NOTICE OF DISCIPLINARY ACTION**

CASE: 2022-MINV-0004

PARTICIPANT: Albany Mining, LLC

RULE VIOLATIONS: **LedgerX DCM Rule 8.3(G) Prohibited Trading Activity; Prohibitions on Fictitious Transactions; Fraudulent Activity and Manipulation**

No Person shall engage in any of the following activities in connection with or related to any Company activity:

G. pre-arranged or non-competitive Transactions (except for Transactions specifically authorized under these Rules).

LedgerX DCM Rule 8.7(A) Supervision; Information Sharing

A Participant shall be responsible for establishing, maintaining, and administering reasonable supervisory procedures to ensure that its Authorized Users comply with these Rules and Applicable Law, and such Participant may be held accountable for the actions of such Authorized Users with respect to the Company.

FINDINGS: Pursuant to an offer of settlement in which Albany Mining, LLC (“Albany”) neither admitted nor denied the rule violations or factual findings upon which the penalty is based, on October 29, 2024, the LedgerX DCM Disciplinary Panel found that between February 16, 2022 and December 29, 2022, Albany’s Authorized Representative pre-arranged numerous trades opposite the same Participant for the purpose of transferring a large position from Albany’s account to that Participant, all under the direction of the other Participant’s Authorized Representative. Albany also failed to ensure that its Authorized Users understand and abide by LedgerX rules.

The Panel thereby concluded that Albany violated LedgerX DCM Rules 8.3(G) and 8.7(A).

PENALTY: In accordance with the settlement offer, and taking into the account the financial condition and current operating status of Albany, the Panel ordered Albany to pay a fine of \$5,000 and permanently suspended Albany from direct and indirect access to any designated contract market, derivatives clearing organization, or swap execution facility owned or controlled by LedgerX LLC.

EFFECTIVE DATE: October 29, 2024