

**CIRCULAR TO:**    **FULL PARTICIPANTS**  
**ASSOCIATE PARTICIPANTS**  
**LOCAL PARTICIPANTS**

**No. 178/00**

**DISCIPLINARY ACTION IMPOSED**  
**BY THE MARKET PRACTICES COMMITTEE**

Participants are advised, pursuant to General By-Law G.11.65, of Disciplinary Action taken by the Market Practices Committee (MPC):

**PARTICIPANT 1**

An enquiry found that a Full Participant and its employee had failed to comply with:

- **Trading Rule TR.10.2(ii)**  
    [Failure to take an Expression of Interest to the Market]
- **Trading Rule TR.17.1(c)(v)**  
    [Withholding in order to cross]

The enquiry identified that the Participant received an Expression of Interest from a client, however it was not broadcast to the market pursuant to Trading Rule TR.10.2(ii). In addition, the Participant received two (2) orders from a client, both of which were not represented to the market until (and after) opposite orders had been received. Thus the Participant was found to have withheld the orders in order to cross.

In accordance with General By-Law G.11.36(b), the MPC imposed a fine of \$5,000 upon the Participant, and in accordance with General By-Law G.11.36(f) the MPC imposed a fine of \$1,000 upon the Participant's employee.

**BRONWYN HILL**  
**MANAGER, SURVEILLANCE**

**22 SEPTEMBER 2000**