

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

VIRTU FINANCIAL INC. and VIRTU  
AMERICAS LLC,

Defendants.

No. 1:23-cv-8072 (JGK)

**[PROPOSED] FINAL JUDGMENT AS TO DEFENDANTS  
VIRTU FINANCIAL INC. AND VIRTU AMERICAS LLC**

**I.**

**WHEREAS**, the Securities and Exchange Commission (the “Commission”) having filed an Amended Complaint (ECF No. 28);

**WHEREAS**, Defendants Virtu Financial, Inc. (“VFI”) and Virtu Americas LLC (“VAL”) having entered general appearances; consented to the Court’s jurisdiction over Defendants and the subject matter of this action; consented to entry of this Final Judgment without admitting or denying any of the allegations in the Amended Complaint (except as to jurisdiction and except as otherwise provided herein); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment;

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED** that Defendant VAL is permanently restrained and enjoined from violating, directly or indirectly, Section 15(g) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. §78o(g)].

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that, as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Final Judgment by personal service or otherwise: (a) VAL's officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with VAL or with anyone described in (a).

**II.**

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that Defendant VAL shall pay a civil penalty in the amount of \$2,500,000 to the Securities and Exchange Commission pursuant to Section 21(d)(3) of the Exchange Act in resolution of the Section 15(g) claim. Defendant VAL shall make this payment within 30 days after entry of this Final Judgment.

VAL may transmit payment electronically to the Commission, which will provide detailed ACH transfer/Fedwire instructions upon request. Payment may also be made directly from a bank account via Pay.gov through the SEC website at <http://www.sec.gov/about/offices/ofm.htm>. VAL may also pay by certified check, bank cashier's check, or United States postal money order payable to the Securities and Exchange Commission, which shall be delivered or mailed to

Enterprise Services Center  
Accounts Receivable Branch  
6500 South MacArthur Boulevard  
Oklahoma City, OK 73169

and shall be accompanied by a letter identifying the case title, civil action number, and name of this Court; Virtu Americas LLC as defendant in this action; and specifying that payment is made by VAL pursuant to this Final Judgment.

VAL shall simultaneously transmit photocopies of evidence of payment and case identifying information to the Commission's counsel in this action. By VAL making this

payment, Defendants relinquish all legal and equitable right, title, and interest in such funds and no part of the funds shall be returned to VAL. The Commission shall send the funds paid pursuant to this Final Judgment to the United States Treasury.

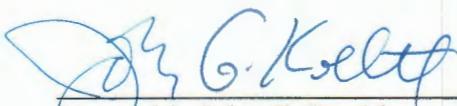
The Commission may enforce the Court's judgment for penalties by the use of all collection procedures authorized by law, including the Federal Debt Collection Procedures Act, 28 U.S.C. § 3001 *et seq.*, and moving for civil contempt for the violation of any Court orders issued in this action. VAL shall pay post-judgment interest on any amounts due after 30 days of the entry of this Final Judgment pursuant to 28 USC § 1961.

### III.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that except as otherwise stated in this Final Judgment and the Consents of Defendants dated September 17, 2025 (the "Consents"), which are incorporated herein with the same force and effect as if fully set forth herein, the Court hereby dismisses with prejudice all other claims and relief sought in this action based on the conduct alleged in the Complaint through the date of this Final Judgment.

**IT IS FURTHER ORDERED, ADJUDGED, AND DECREED** that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

Dated: 12/2, 2025



Honorable John G. Koeltl  
United States District Judge

*The Clerk is respectfully directed  
to close this case. So ordered.  
John G. Koeltl  
12/2/25 U.S.D.J.*