

Title: Crime and Punishment

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**\*\*WARNING:\*\*** Complete this form truthfully. False statements or OMISSIONS may result in denial of your application, revocation of your registration, or **\*\*CRIMINAL PROSECUTION\*\***.

CITADEL ADVISORS LLC, **\*\*AKA:\*\***

ASHLER CAPITAL LLC (RELYING ADVISER),

CITADEL ADVISORS II LLC (RELYING ADVISER),

CITADEL ASIA LIMITED (F/K/A CITADEL (HONG KONG) LIMITED) (RELYING ADVISER),

CITADEL EUROPE LLP (RELYING ADVISER),

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CITADEL INVESTMENT CONSULTING (SHENZHEN) COMPANY LIMITED (RELYING ADVISER),

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[<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>)

[<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://preview.redd.it/7wlscweq57k71.png?width=1277&format=png&auto=webp&s=b2f13f7e348c3eddf5302ef1ab8df4df7db52535>)

The excerpt below is from: [<https://www.thsh.com/publications/sec-proposed-rules-aim-at-removing-confusion-about-the-registration-of-affiliated-investment-advisers-umbrella-registrations1>](<https://www.thsh.com/publications/sec-proposed-rules-aim-at-removing-confusion-about-the-registration-of-affiliated-investment-advisers-umbrella-registrations1>)

## ..the SEC will continue to treat two or more affiliated advisers that are separate legal entities but are operationally integrated as a single adviser, but it plans to revise Form ADV to accommodate these organizational structures and add a new Schedule R for affiliate advisers. The proposal is geared towards US investment advisers; however, treatment of non-US investment advisers is also addressed in this article.

## ## Key Definitions

Three key definitions in understanding the Umbrella Registration rules set out in the Release:

1. "Umbrella Registration": a single registration by a Filing Adviser and one or more Relying Advisers who collectively conduct a single advisory business and meet the conditions set forth in the Release.
2. "Filing Adviser": an investment adviser eligible to register with the SEC that files a single umbrella registration on behalf of itself and each of its Relying Advisers.
3. "Relying Adviser": an investment adviser eligible to register with the SEC that relies on a Filing Adviser to file a single Umbrella Registration on its behalf. The Relying Adviser would continue to be required to register in its own right.

Citadel Advisors LLC has **\*\*OMITTED\*\*** the name of its Chief Compliance Officer, and in the absence of one, the Additional Regulatory Contact Person field must be completed. [<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>)

826.pdf)

[Citadel Advisors LLC has OMITTED the name of its Chief Compliance Officer, and in the absence of one, the Additional Regulatory Contact Person field must be completed. <https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://preview.redd.it/94x0jnx87k71.png?width=1281&format=png&auto=webp&s=74b31819461cd8def265b69252e6bd93d239c0bb>)

Here he is, Michael Loughney, Chief Compliance Officer for Ashler Capital, AKA Citadel Advisors LLC.. How come you left your name out of the umbrella Form ADV for Citadel Advisors LLC, Michael?

[Chief Compliance Officer for Ashler Capital Michael Loughney, mysteriously absent from Citadel Advisors LLC Form ADV.. wut doing, Michael?](<https://preview.redd.it/82hm7jmoh8k71.png?width=794&format=png&auto=webp&s=1f43dab5dc0b16b6822d928356445b3af26fb418>)

The text below is copied from "Part 2 - Brochures", found at:

[<https://adviserinfo.sec.gov/firm/summary/148826>](<https://adviserinfo.sec.gov/firm/summary/148826>)

..In this Brochure, each of the private investment funds managed by the Advisers, and the sub-funds in which they invest, are generally referred to as a "Fund," and are generally referred to collectively as the "Funds."

As of December 31, 2020, the Advisers had approximately \$33,097,091,000 of assets under management, all of which was managed on a discretionary basis.

**\*\*Citadel Advisors is wholly owned by Citadel Advisors Holdings LP.\*\*** Citadel Europe is principally-owned by Citadel Management (Europe) Limited. Citadel Asia, Citadel Sweden, Citadel France and Citadel Singapore are each wholly owned by Citadel Americas LLC. The Advisers are indirectly controlled by Citadel GP LLC or its related persons and use the investment personnel, infrastructure and support provided by Citadel Americas LLC and its affiliates. Citadel GP LLC and Citadel Americas LLC are controlled by **\*\*Kenneth Griffin, their Founder and Chief Executive Officer.\*\***

The Advisers are members of a group of affiliated entities that together comprise a leading global financial institution with a diverse business platform (collectively, "Citadel Group"), which includes two separate and distinct units: (i) a global investment firm ("Citadel") and (ii) a global market maker ("Citadel Securities").

**\*\*As of the latest form ADV, May 27 2021, Citadel Advisors LLC reported Assets Under Management of \$244,269,595,218\*\***

**\*\*Kenny is paid a percentage of assets under his management.. he is financially motivated to report grossly inflated levels of assets under management.\*\***

Page 28 from: [<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>)

[As of the latest form ADV, May 27 2021, Citadel Advisors LLC reported Assets Under Management of \$244,269,595,218, Page 28 from: <https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://preview.redd.it/7vfk7ne9i7k71.png?width=1120&format=png&auto=webp&s=ad91b943aa32f768f3e1f472df62b97ebc452bcd>)

Page 28 from: [<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>)

[Page 28 from: <https://reports.adviserinfo.sec.gov/reports/ADV/148826/PDF/148826.pdf>](<https://preview.redd.it/7yd8npv038k71.png?width=1278&format=png&auto=webp&s=9bb93f64820073084cc82401730f7dc9bf8c076b>)

[<https://adviserinfo.sec.gov/firm/summary/148826>](<https://adviserinfo.sec.gov/firm/summary/148826>) \-

Under the tab, Accountant Surprise Examination Report, this text can be found, as well as \*\*the absence of ANY OF THE REQUIRED ANNUAL FORM ADV-E SUBMISSIONS!!\*\*

"Investment advisers that have custody of (the authority to access) client funds or securities are required to undergo an annual surprise examination by an independent public accountant to verify the clients' funds and securities (see Investment Advisers Act rule 206(4)-2 for more information). Form ADV-E also must be filed when the accountant resigns, is dismissed, or is otherwise terminated from the engagement, or if the accountant removes itself or is removed from consideration for reappointment. These filings are available at the Form ADV-E cover page and report links below."

[<https://adviserinfo.sec.gov/firm/summary/148826> Where Form ADV-E, Kenny? You are required to file these annually. Better get on it, bitch!](<https://preview.redd.it/ktv5wd2sa7k71.png?width=1679&format;=png&auto;=webp&s;=a38921957abed9504255114fd87e7e5e59d6271d>)

Who should we call to report this? Probably the Secret Service and the FBI will be inclined to act more than the SEC, given their inherent revolving-door relationship with the CTFC..

[Citadel is able to pay an ex-employee through this particular loophole, payable through the fund described on page 7 - [https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778\\_406ba.htm](https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778_406ba.htm)](<https://preview.redd.it/ptj9ngcid7k71.png?width=1440&format;=png&auto;=webp&s;=2c54974a26c6ae35da6480a1027aaefe6336ae61>)

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[[https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778\\_406ba.htm](https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778_406ba.htm)]([https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778\\_406ba.htm](https://www.sec.gov/Archives/edgar/data/1255158/000090514820001113/efc20-778_406ba.htm))

Let's not forget about the man who is supposedly fighting for US, Gary Gensler, prior to his current post at the SEC, served as Chair of CFTC..

[<https://www.cftc.gov/About/Commissioners/FormerCommissioners/ggensler.html>](<https://www.cftc.gov/About/Commissioners/FormerCommissioners/ggensler.html>)

[Gary Gensler, prior to his current post at the SEC, served as Chair of CFTC.. <https://www.cftc.gov/About/Commissioners/FormerCommissioners/ggensler.html>](<https://preview.redd.it/h6mqf3v4e7k71.png?width=1088&format;=png&auto;=webp&s;=45dd81cfc93c74d899a5b8de2632bc725591b737>)

Hey Secret Service, are you interested in the sexiest case you have ever been a part of? The global counterfeiting racket involving USA treasury bonds and notes, corporate securities and financial instruments? The investigation will make the Panama Papers look like the relative size of the country that it is when compared with the USA Papers!