



governmentattic.org

"Rummaging in the government's attic"

Description of document:	Commodity Futures Trading Commission (CFTC) employee recusal letters and employee recusal determinations at CFTC, 2012-2017
Requested date:	01-July-2017
Released date:	17-January-2018
Posted date:	29-January-2018
Source of document:	FOIA Compliance Office Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street NW Washington, DC 20581 Online FOIA Request Form

The governmentattic.org web site ("the site") is noncommercial and free to the public. The site and materials made available on the site, such as this file, are for reference only. The governmentattic.org web site and its principals have made every effort to make this information as complete and as accurate as possible, however, there may be mistakes and omissions, both typographical and in content. The governmentattic.org web site and its principals shall have neither liability nor responsibility to any person or entity with respect to any loss or damage caused, or alleged to have been caused, directly or indirectly, by the information provided on the governmentattic.org web site or in this file. The public records published on the site were obtained from government agencies using proper legal channels. Each document is identified as to the source. Any concerns about the contents of the site should be directed to the agency originating the document in question. GovernmentAttic.org is not responsible for the contents of documents published on the website.



FOIA Office

U.S. COMMODITY FUTURES TRADING COMMISSION

Three Lafayette Centre
1155 21st Street, NW, Washington, DC 20581
www.cftc.gov

January 17, 2018

RE: 17-00114-FOIA

A copy of each employee recusal letter or employee recusal determination at CFTC during Calendar Years 2013, 2014, 2015, 2016 and 2017 to date.

This is in response to your request dated July 1, 2017, under the Freedom of Information Act seeking access to a copy of each employee recusal letter or employee recusal determination at CFTC during calendar years 2013, 2014, 2015, 2016 and 2017 to date. In accordance with the FOIA and agency policy, we have searched our records, as of July 3, 2017, the date we received your request in our FOIA office.

We have located 395 pages of responsive records. I am granting partial access to, and am enclosing copies of, the accessible records. Forty-seven pages are exempt in full, and portions of remaining pages, fall within the exemptions to the FOIA's disclosure requirements, as explained below.

Some responsive records contain staff analyses, opinions, and recommendations. Those portions are deliberative and pre-decisional and are an integral part of the agency's decision making process. They are exempt from the FOIA's disclosure requirements by FOIA Exemption 5. 5 U.S.C. § 552(b)(5); *See NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132 (1975).

In addition, some records contain personal information, which is exempt from release under FOIA Exemption 6 because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. 5 U.S.C. § 552(b)(6); *See also The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

If you have any questions about the way we handled your request, or about our FOIA regulations or procedures, please contact Tameka Tilliman at 202-418-5091, or Jonathan Van Doren, our FOIA Public Liaison, at 202-418-5505.

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001, email at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Commodity Futures Trading Commission, Three Lafayette Centre, 8th Floor, 1155 21st Street, N.W., Washington, D.C. 20581, within 90 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

Sincerely,

A handwritten signature in blue ink, appearing to read "Candace Ambrose".

Candace Ambrose
Counsel

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 12:11 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Gregory Christopher Evans

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Tuesday, September 02, 2014 11:55 AM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason
Subject: FW: Request for Seriatim Concurrence - Gregory Christopher Evans

(b)(5)

From: Charley, Willie
Sent: Tuesday, September 02, 2014 11:36 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Gregory Christopher Evans

Mark/Ajay,

DOE has submitted the attached document (Gregory Christopher Evans) to be entered into seriatim. Please review to determine if Commissioner Bowen and Commissioner Giancarlo may/may not participate.

Thanks much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Tuesday, September 02, 2014 11:01 AM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather

Subject: Request for Seriatim Concurrence - Gregory Christopher Evans

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Paul Hayeck.

Thank you very much.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6)

(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 10:26 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Vitol Inc.

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5) Thank you.

From: Blase, Marcia K.
Sent: Tuesday, September 02, 2014 9:55 AM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason
Subject: FW: Request for Seriatim Concurrence - Vitol Inc.

(b)(5)

(b)(5)

From: Charley, Willie
Sent: Friday, August 29, 2014 4:01 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Vitol Inc.

Hello,

DOE submitted the attached document (Vitol Inc.) for seriatim submission. Please review and determine if Commissioners Bowen and Giancarlo may/may not participate.

Thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Friday, August 29, 2014 3:44 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather
Subject: Request for Seriatim Concurrence - Vitol Inc.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

My understanding is that there were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Rick Glaser or Liz Davis.

Thank you very much.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel

Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 9:56 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Inter Global Currency & Precious Metals LLC

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Friday, August 29, 2014 5:13 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - Inter Global Currency & Precious Metals LLC

(b)(5)

From: Charley, Willie
Sent: Friday, August 29, 2014 3:42 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;

Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Inter Global Currency & Precious Metals LLC

Hello,

DOE submitted the attached document (Inter Global Currency & Precious Metals LLC) for seriatim submission. Please review and determine if Commissioners Bowen and Giancarlo may/may not participate.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Friday, August 29, 2014 3:41 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather

Subject: Request for Seriatim Concurrence - Inter Global Currency & Precious Metals LLC

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Rick Glaser or Jim Holl.

Thank you very much.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 9:38 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Kenneth and Luke Thrasher

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Friday, August 29, 2014 4:17 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - Kenneth and Luke Thrasher

(b)(5)

From: Charley, Willie
Sent: Friday, August 29, 2014 3:26 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;

Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Kenneth and Luke Thrasher

Hello,

DOE submitted the attached document (Kennith and Luke Thrasher) for seriatim submission. Please review and determine if Commissioners Bowen and Giancarlo may/may not participate.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Friday, August 29, 2014 3:20 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather

Subject: Request for Seriatim Concurrence - Kenneth and Luke Thrasher

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

My understanding is that there were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Manal Sultan.

Thank you very much.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 9:18 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Louis J. Ferone

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5) Thank you.

From: Blase, Marcia K.
Sent: Friday, August 29, 2014 3:58 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - Louis J. Ferone

(b)(5)

From: Charley, Willie
Sent: Friday, August 29, 2014 3:18 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;

Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Louis J. Ferone

Hello,

DOE submitted the attached document (Louis J. Ferone) for seriatim submission. Please review and determine if Commissioners Bowen and Giancarlo may/may not participate.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Friday, August 29, 2014 3:04 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather

Subject: Request for Seriatim Concurrence - Louis J. Ferone

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

My understanding is that there were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Manal Sultan.

Thank you very much.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 8:59 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Highlands Capital Management, L.P.

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Thursday, August 28, 2014 1:47 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - Highlands Capital Management, L.P.

(b)(5)

From: Charley, Willie
Sent: Thursday, August 28, 2014 12:47 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;

Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Highlands Capital Management, L.P.

Mark/Ajay,

DOE has submitted the attached document (Highlands Capital Management) to be entered into seriatim. Please review to determine if Commissioner Bowen and Commissioner Giancarlo may/may not participate.

Thanks much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Tuesday, August 05, 2014 4:44 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew

Subject: Request for Seriatim Concurrence - Highlands Capital Management, L.P.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Rick Glaser.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6)

(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, September 2, 2014 8:29 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - FXDD

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Thursday, August 28, 2014 1:20 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - FXDD

(b)(5)

From: Charley, Willie
Sent: Thursday, August 28, 2014 8:45 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - FXDD

Mark/Ajay,

DOE has submitted the attached document (FXDD) to be entered into seriatim. Please review to determine if Commissioner Bowen and Commissioner Giancarlo may/may not participate.

Thanks much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Wednesday, August 27, 2014 5:25 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather

Subject: Request for Seriatim Concurrence - FXDD

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

My understanding is that there were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Chuck Marvine.

Thank you very much.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, August 29, 2014 4:04 PM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Utility Special Entities De Minimis Exclusion Regulation Final Release

Amir, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance. Thanks.

From: Zaidi, Amir
Sent: Friday, August 29, 2014 3:02 PM
To: Gottry, Heather; Dolan, John; Marcus, Jonathan L.
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: Utility Special Entities De Minimis Exclusion Regulation Final Release
Importance: High

All,

(b)(5)

(b)(5)

Let me know if you have any questions. Please note the high priority placed on this item (i.e., today).

Thanks,
Amir

From: Charley, Willie
Sent: Friday, August 29, 2014 11:55 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Charley, Willie
Subject: FW: Utility Special Entities De Minimis Exclusion Regulation Final Release
Importance: High

Hello,

DSIO submitted the attached matter for seriatim submission. May Commissioners Bowen and Giancarlo participate?

Standing by....

Willie

From: Remmler, Erik F
Sent: Friday, August 29, 2014 11:44 AM
To: Inbox – Secretariat
Cc: Ogilvie, Clark; Stewart, Lawranne; Barnett, Gary; Gold, Barbara S.; Cummings, Christopher W.; Goodman, Israel J.; Marcus, Jonathan L.; Srinivasan, Sayee; Kim, Carlene; Kane, Stephen A; Badian, Laura; Pallais, Elise; Fisanich, Frank
Subject: Utility Special Entities De Minimis Exclusion Regulation Final Release

Attached is the draft final release concerning the above referenced matter to be prepared for seriatim circulation pending approval from the Chairman's office. Also attached is the transmittal memorandum for the attached release.

Thank you,
Erik

Erik F. Remmler
Deputy Director, Registration and Compliance
Division of Swap Dealer and Intermediary Oversight
Commodity Futures Trading Commission
eremmler@cftc.gov 202-418-7630

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, August 29, 2014 8:56 AM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Zero Chaos Advisors

Amir, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance. Thanks.

From: Zaidi, Amir
Sent: Thursday, August 28, 2014 3:54 PM
To: Gottry, Heather; Dolan, John; Marcus, Jonathan L.
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - Zero Chaos Advisors

All,

(b)(5)

(b)(5)

Please let me know if you have any questions.

Amir

From: Charley, Willie

Sent: Thursday, August 28, 2014 11:51 AM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Zero Chaos Advisors

Mark/Ajay,

DOE has submitted the attached document (Zero Chaos Advisors) to be entered into seriatim. Please review to determine if Commissioner Bowen and Commissioner Giancarlo may/may not participate.

Thanks much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Thursday, August 28, 2014 11:42 AM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather

Subject: Request for Seriatim Concurrence - Zero Chaos Advisors

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Manal Sultan.

Thank you very much.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, August 29, 2014 8:41 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Absa Bank

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

you.

Thank

From: Blase, Marcia K.
Sent: Thursday, August 28, 2014 5:27 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - Absa Bank

(b)(5)

From: Charley, Willie
Sent: Thursday, August 28, 2014 3:39 PM

To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Absa Bank

Mark/Ajay,

DOE has submitted the attached document (Absa Bank) to be entered into seriatim. Please review to determine if Commissioner Bowen and Commissioner Giancarlo may/may not participate.

Thanks much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Thursday, August 28, 2014 3:36 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew; Dolan, John; Gottry, Heather
Subject: Request for Seriatim Concurrence - Absa Bank

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Chuck Marvine.

Thank you very much.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, August 28, 2014 1:43 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: Ethics Screening for Uncleared Margin Rules

Marcia – Thank you for sharing the information and analysis below. We will circle back after we have a chance to review and discuss internally. Thanks.

- Heather

From: Blase, Marcia K.
Sent: Wednesday, August 27, 2014 5:11 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Sutaria, Ajay; Zaidi, Amir
Subject: Ethics Screening for Uncleared Margin Rules
Importance: High

Jonathan, John and Heather,

(b)(5)



(b)(5)



Please let me know if you have any questions.

Thanks,
Marcia

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 12:03 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - S.A.C. Capital Advisors, L.P. et al.

An ethics review has been completed regarding seriatim for the concurrence

(b)(5)

(b)(5)

From: Blase, Marcia K.
Sent: Monday, August 18, 2014 5:34 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - S.A.C. Capital Advisors, L.P. et al.

(b)(5)

(b)(5)



Please let me know if you have any questions.

Marcia

From: Charley, Willie

Sent: Monday, August 18, 2014 4:00 PM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - S.A.C. Capital Advisors, L.P. et al.

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Monday, August 18, 2014 3:19 PM
To: Inbox – Secretariat
Cc: Burr, Andrew; Smith, Yolanda E.
Subject: Request for Seriatim Concurrence - S.A.C. Capital Advisors, L.P. et al.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Manal Sultan.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 11:34 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Absent Objection Memo -- Recognition of NYMEX and COMEX in Italy

Ajay, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if

we can be of further assistance. Thanks

From: Sutaria, Ajay
Sent: Wednesday, August 20, 2014 9:44 AM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir
Subject: FW: Absent Objection Memo -- Recognition of NYMEX and COMEX in Italy

(b)(5)

(b)(5)

Please let me know if you have any questions.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, August 20, 2014 8:55 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Absent Objection Memo -- Recognition of NYMEX and COMEX in Italy

Mark/Ajay,

OIA has submitted the attached documents (Recognition of NYMEX and COMEX in Italy) to be entered into absent objection. Please review to determine if Commissioners Bowen and Giancarlo may/may not participate in this matter.

Standing by....thanks,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Khachaturian, Alex
Sent: Tuesday, August 19, 2014 4:44 PM
To: Inbox – Secretariat
Cc: Josephson, Sarah E; Rosenfeld, Robert H.; Gorlick, Warren
Subject: Absent Objection Memo -- Recognition of NYMEX and COMEX in Italy

Attached are electronic copies of the absent objection documents just submitted. We would greatly appreciate a final response by **Monday September 8, 2014** (accounting for the Labor Day holiday).

Thank you,

Alex Khachaturian
Attorney-Advisor
Office of International Affairs
U.S. Commodity Futures Trading Commission
1155 21st St. NW
Washington, DC 20581
Ph: +1-202-418-6708
Fax: +1-202-418-5548

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 8:42 AM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Bilateral MOU - CFTC and FRB

Amir, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance. Thanks

From: Zaidi, Amir
Sent: Monday, August 25, 2014 4:59 PM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: Bilateral MOU - CFTC and FRB

(b)(5)

Please let me know if you have any questions.

Amir

From: Charley, Willie
Sent: Monday, August 25, 2014 11:35 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Charley, Willie
Subject: FW: Bilateral MOU - CFTC and FRB

Good morning,

DCR has submitted the attached documents to be entered into seriatim. If you would, please review the attachments to determine if Commissioners Bowen and Giancarlo may/may not participate.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Astrada, Laura
Sent: Monday, August 25, 2014 10:46 AM
To: Charley, Willie
Cc: Radhakrishnan, Ananda; Wasserman, Robert B.; Partridge, Jocelyn; Stewart, Lawranne
Subject: FW: Bilateral MOU - CFTC and FRB

Good morning. Could you please circulate the attached bilateral Memorandum of Understanding between the Commission and the Board of Governors of the Federal Reserve System and accompanying Memorandum to the Commissioners (the point of contact for this should be Bob)? If possible and convenient, we would prefer review by the end of this week. In addition, due to travel schedules, we were delayed in organizing this. Apologies for any inconvenience this may cause. Please let me know if you have any questions.

Best,
Laura

From: Stewart, Lawranne
Sent: Monday, August 18, 2014 6:23 PM
To: Partridge, Jocelyn
Cc: Radhakrishnan, Ananda; Wasserman, Robert B.; Astrada, Laura
Subject: RE: Bilateral MOU - CFTC and FRB

Jody – This is ok to circulate to the commission. Thank you.

From: Partridge, Jocelyn
Sent: Tuesday, August 12, 2014 2:26 PM
To: Stewart, Lawranne
Cc: Radhakrishnan, Ananda; Wasserman, Robert B.; Astrada, Laura
Subject: Bilateral MOU - CFTC and FRB

Lawranne,

Attached for your review and comment are the following documents, which the Division of Clearing and Risk ("DCR") is seeking to circulate to the Commission.

- (1) The bilateral Memorandum of Understanding between the Commission and the Board of Governors of the Federal Reserve System that we have been working on. They have accepted our last offer. Indeed, the document has been executed by their General Counsel (who has the power to do so under their regime).
- (2) A Memorandum to the Commission that would be sent from DCR requesting that the Commission approve the MOU and authorize the Director of DCR to sign the MOU on the Commission's behalf.

The documents have been circulated to the Office of General Counsel and the Division of Enforcement, neither of which requested any changes. Accordingly, the memo indicates that they have been consulted.

Please let us know if you have any comments and questions.

Best,

Jody

Jocelyn B. Partridge
Special Counsel
Division of Clearing and Risk
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20851
202.418.5926
jpartridge@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 8:21 AM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: American Council of Life Insurers Request for Interpretative Relief

Amir, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance.

Thanks

From: Zaidi, Amir
Sent: Monday, August 25, 2014 6:41 PM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: American Council of Life Insurers Request for Interpretative Relief

(b)(5)

(b)(5)

DSIO intends to issue this interpretation on September 2nd. Please let me know if you have any questions.

Amir

From: Charley, Willie
Sent: Friday, August 22, 2014 1:03 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: American Council of Life Insurers Request for Interpretative Relief

Mark/Ajay,

DSIO has submitted the attached documents to be entered into absent objection. Please review to determine if Commissioners Bowen and Giancarlo may/may not participate in this matter.

Please requested deadline for complete review: September 2, 2014

Thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Groover, Elizabeth
Sent: Friday, August 22, 2014 12:31 PM
To: Inbox – Secretariat
Cc: Barnett, Gary; Remmler, Erik F; Olear, Amanda L; Stewart, Lawranne
Subject: American Council of Life Insurers Request for Interpretative Relief

Good afternoon,

Attached please find an interpretative letter that DSIO intends to issue to the American Council of Life Insurers, granting an interpretation that General Account Entities, established and operated by affiliated life insurance companies as described in the Correspondence and Division response, are not within the definition of “commodity pool” in CEA Section 1a(10) or Regulation 4.10(d). Please place this into absent objection upon Lawranne Stewart’s release. The deadline should be set for noon on Tuesday, September 2, 2014.

Also attached are the incoming request for relief from ACLI and a brief memo to the Commission summarizing the letter. Please do not hesitate to contact us with any questions or concerns you may have.

Elizabeth M. Groover

Special Counsel

Division of Swap Dealer and Intermediary Oversight, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202.418.5985 | Fax: 202.418.5407 |

egroover@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 8:05 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Exemptive Letter Providing Relief to Registered CPOs that only Operate Pools under Rules 4.5 or 4.13(a)(3)

Marcia, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance.

Thanks

From: Blase, Marcia K.
Sent: Monday, August 25, 2014 2:00 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: Exemptive Letter Providing Relief to Registered CPOs that only Operate Pools under Rules 4.5 or 4.13(a)(3)

(b)(5)

Please let me know if you have any questions.

Thanks,
Marcia

From: Charley, Willie
Sent: Friday, August 22, 2014 2:49 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Exemptive Letter Providing Relief to Registered CPOs that only Operate Pools under Rules 4.5 or 4.13(a)(3)

Mark/Ajay,

DSIO has submitted the attached documents to be entered into absent objection. Please review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thanks much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Olear, Amanda L
Sent: Friday, August 22, 2014 1:59 PM
To: Inbox – Secretariat
Cc: Ehrstein, Michael W.; Barnett, Gary; Remmler, Erik F; Stewart, Lawranne
Subject: Exemptive Letter Providing Relief to Registered CPOs that only Operate Pools under Rules 4.5 or 4.13(a)(3)

Good afternoon:

Please find attached an exemptive letter that DSIO intends to issue providing exemptive relief to registered CPOs that only operate pools pursuant to Commission regulations 4.5 or 4.13(a)(3) such that the CPO would not be required to file a Form CPO-PQR. Please place this into absent objection upon Lawranne Stewart's release. The deadline should be set for noon on Tuesday, September 2, 2014.

Also attached is a brief memo to the Commission summarizing the letter. Please do not hesitate to contact us with any questions or concerns that you might have.

Best,
Amanda Olear
Associate Director
Division of Swap Dealer and Intermediary Oversight

United States Commodity Futures Trading Commission
1155 21st St., N.W.
Washington, D.C. 20581
Telephone: 202-418-5283
email: aolear@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 7:50 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: No-Action Letter permitting Consolidation of Financial Reporting for Non-RICs

Marcia, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we

can be of further assistance. Thanks

From: Blase, Marcia K.
Sent: Monday, August 25, 2014 5:01 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: No-Action Letter permitting Consolidation of Financial Reporting for Non-RICs

(b)(5)

Please let me know if you have any questions.

Thanks,

Marcia

From: Charley, Willie
Sent: Friday, August 22, 2014 2:33 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: No-Action Letter permitting Consolidation of Financial Reporting for Non-RICs

Mark/Ajay,

DSIO has submitted the attached documents to be entered into absent objection. Please review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thanks much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Olear, Amanda L
Sent: Friday, August 22, 2014 1:45 PM
To: Inbox – Secretariat
Cc: Jung, Chang; Barnett, Gary; Remmler, Erik F; Stewart, Lawranne
Subject: No-Action Letter permitting Consolidation of Financial Reporting for Non-RICs

Good Afternoon:

Please find attached a no-action letter that DSO intends to issue to permit CPOs of commodity pools that are not registered investment companies to consolidate the financial reporting of the parent commodity pool with that of the pool's trading subsidiary(ies) under certain circumstances. This letter is consistent with relief provided to CPOs of registered investment companies in CFTC Staff Letter 13-51. Please place this letter into absent objection upon Lawranne Stewart's release. The deadline should be set for noon on Tuesday, September 2, 2014.

Also attached is a brief memo to the Commission summarizing the letter. Please to not hesitate to contact us with any questions or concerns you may have.

Best,
Amanda Olear
Associate Director
Division of Swap Dealer and Intermediary Oversight
United States Commodity Futures Trading Commission
1155 21st St., N.W.
Washington, D.C. 20581
Telephone: 202-418-5283

email: aolear@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 27, 2014 7:42 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Exemption Letter permitting the use of Third-Party Recordkeepers

Marcia, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance.

Thanks

From: Blase, Marcia K.
Sent: Monday, August 25, 2014 2:34 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: Exemption Letter permitting the use of Third-Party Recordkeepers

(b)(5)

Please let me know if you have any questions.

Thanks,
Marcia

From: Charley, Willie
Sent: Friday, August 22, 2014 2:41 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Exemption Letter permitting the use of Third-Party Recordkeepers

Mark/Ajay,

DSIO has submitted the attached documents to be entered into absent objection. Please review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thanks much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Olear, Amanda L
Sent: Friday, August 22, 2014 1:52 PM
To: Inbox – Secretariat
Cc: Ehrstein, Michael W.; Barnett, Gary; Remmler, Erik F; Stewart, Lawranne
Subject: Exemption Letter permitting the use of Third-Party Recordkeepers

Good afternoon:

Please find attached an exemptive letter that DSIO intends to issue expanding the entities that CPOs are permitted to use for maintaining its books and records consistent with the provisions of Commission regulations 4.7(b)(4) or 4.23(c). The letter would permit CPOs to use additional third-party recordkeepers beyond those enumerated in Commission regulation 4.7(b)(4) and 4.23(c) provided that the CPO filed notice pursuant to the terms of those regulations. Please place this into absent objection upon Lawranne Stewart's release. The deadline should be set for noon on Tuesday, September 2, 2014.

Also, attached is a brief memo to the Commission summarizing the letter. Please do not hesitate to contact us with any questions or concerns that you might have.

Best,
Amanda Olear
Associate Director
Division of Swap Dealer and Intermediary Oversight
United States Commodity Futures Trading Commission
1155 21st St., N.W.
Washington, D.C. 20581

Telephone: 202-418-5283
email: aolear@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, August 26, 2014 11:49 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: HOT - FW: seriatim in CFTC v US Bank

An ethics review has been completed regarding seriatim (b)(5)

(b)(5)



From: Blase, Marcia K.
Sent: Tuesday, August 26, 2014 11:16 AM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: HOT - FW: seriatim in CFTC v US Bank
Importance: High

(b)(5)



(b)(5)

Please note that Enforcement has requested Commission approval by Sept. 2 to meet a Sept. 4 deadline set by the court, and let me know if you have any questions.

Thanks,
Marcia

From: Charley, Willie
Sent: Tuesday, August 26, 2014 9:59 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Charley, Willie
Subject: HOT - FW: seriatim in CFTC v US Bank
Importance: High

Mark/Ajay,

This is a HOT seriatim from OGC with a requested approval date through the Commission of Tuesday, September 2nd. Please review for ethics approval on behalf of Commissioners Bowen and Giancarlo. Standing by for your prompt responses to this matter.

V/r,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Connelly, Mary T.
Sent: Tuesday, August 26, 2014 9:47 AM
To: Kirkpatrick, Chris
Subject: seriatim in CFTC v US Bank

Chris,

Attached is the seriatim we discussed. I will give you a call shortly to followup.

Thank you,

Mary

Mary T. Connelly
Assistant General Counsel
Office of the General Counsel
Commodity Futures Trading Commission
1155 21st Street, NW
Washington, DC 20581
(202) 418-5866 (phone)
mconnelly@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, August 26, 2014 11:05 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: 21 Aug 14 - FW: DMO No-Action Letter and Cover Memo - Submitted for Recusal Check Only

Ok thanks Marcia.

From: Blase, Marcia K.
Sent: Tuesday, August 26, 2014 10:30 AM
To: Dolan, John
Subject: RE: 21 Aug 14 - FW: DMO No-Action Letter and Cover Memo - Submitted for Recusal Check Only

Hi John. (b)(5)

(b)(5)

Thanks,
Marcia

From: Dolan, John
Sent: Tuesday, August 26, 2014 10:13 AM
To: Blase, Marcia K.
Subject: RE: 21 Aug 14 - FW: DMO No-Action Letter and Cover Memo - Submitted for Recusal Check Only

Marcia, just to make sure. (b)(5)

(b)(5)

From: Blase, Marcia K.
Sent: Monday, August 25, 2014 11:12 AM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: 21 Aug 14 - FW: DMO No-Action Letter and Cover Memo - Submitted for Recusal Check Only
Importance: High

John and Heather,

(b)(5)

(b)(5)

(b)(5)

I would appreciate your thoughts.

Marcia

From: Charley, Willie

Sent: Thursday, August 21, 2014 12:00 PM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat

Subject: 21 Aug 14 - FW: DMO No-Action Letter and Cover Memo - Submitted for Recusal Check Only

Importance: High

Mark/Ajay,

DMO has submitted the attached documents for an ethics review prior to entering into absent objection. Please review and determine if Commissioners Bowen and Giancarlo may/may not participate.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Pepper, David N.
Sent: Thursday, August 21, 2014 11:48 AM
To: Jurgens, Melissa; Inbox – Secretariat
Cc: Van Wagner, David; McGonagle, Vincent A.; Barnett, Gary; Nathan, Susan W.; Ogilvie, Clark
Subject: DMO No-Action Letter and Cover Memo - Submitted for Recusal Check Only

Melissa,

OGC has provided sign-off on the attached no-action letter and cover memo. Please initiate a conflicts/recusal check in anticipation of absent objection circulation. Please find attached: (1) no-action letter providing conditional relief to qualifying Australian licensed markets, and (2) cover memo.

Please contact me once the conflicts/recusal check is complete, and please let me know if you have any questions or require additional information.

Kind regards,

David Pepper

David N. Pepper
Attorney-Advisor, Office of the Chief Counsel
-Division of Market Oversight, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington, DC 20581 | Tel: 202.418.5565

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, August 25, 2014 1:07 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Submitted for Seriatim - Proposed Amendments to Part 14

Marcia, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance. Thanks.

From: Blase, Marcia K.
Sent: Thursday, August 14, 2014 12:05 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Jason M. Goggins (JGoggins@CFTC.gov)
Subject: FW: Submitted for Seriatim - Proposed Amendments to Part 14

(b)(5)

From: Kirkpatrick, Chris
Sent: Tuesday, August 05, 2014 4:19 PM
To: Gottry, Heather; Dolan, John
Cc: Marcus, Jonathan L.; Fajfar, Mark; Blase, Marcia K.; Goggins, Jason; Sutaria, Ajay; Charley, Willie
Subject: Submitted for Seriatim - Proposed Amendments to Part 14

Heather and John,

(b)(5)

(b)(5)

Please let me know if you have any questions, or need additional information. Thank you.

Chris

Christopher J. Kirkpatrick
Acting Secretary of the Commission
Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202.418.5964

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, August 25, 2014 11:17 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>
Subject: RE: Yieldbroker

Thank you.

From: Blase, Marcia K.
Sent: Monday, August 25, 2014 11:15 AM
To: Dolan, John
Cc: Gottry, Heather; Marcus, Jonathan L.; Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: Yieldbroker

John,

This is the email that memorialized my discussion with Heather regarding Yieldbroker.

From: Blase, Marcia K.
Sent: Tuesday, August 05, 2014 10:50 AM
To: Gottry, Heather; Marcus, Jonathan L.
Cc: Jason M. Goggins (JGoggins@CFTC.gov); Sutaria, Ajay
Subject: FW: DMO No-Action Letter and Cover Memo

Heather, to follow-up on our discussion yesterday, (b)(5)

(b)(5)



From: Blase, Marcia K.
Sent: Wednesday, July 30, 2014 11:52 AM
To: Dolan, John; Gottry, Heather; Marcus, Jonathan L.
Cc: Jason M. Goggins (JGoggins@CFTC.gov); Sutaria, Ajay
Subject: FW: DMO No-Action Letter and Cover Memo

John/Heather, I know you are swamped right now Heather and that John is out of the office, but wanted to let you know that I'd like to discuss this matter with you when you get a chance to get your take on whether recusal is appropriate. The deadline on this is Aug. 11, so discussion sometime next week would be fine.

Thanks,
Marcia

From: Charley, Willie
Sent: Wednesday, July 30, 2014 9:26 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Inbox – Secretariat
Subject: FW: DMO No-Action Letter and Cover Memo

Good morning,

Today, 30 July 14, the Division of Market Oversight submitted the attached document (No-Action Letter-Yieldbroker) to be entered into absent objection. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

The requested due date for completion of the absent objection process is: Monday, 11 Aug 14.

Standing by and thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Pepper, David N.
Sent: Tuesday, July 29, 2014 3:42 PM
To: Jurgens, Melissa; Inbox – Secretariat
Cc: Van Wagner, David; McGonagle, Vincent A.; Nathan, Susan W.; Dunfee, John
Subject: DMO No-Action Letter and Cover Memo

Melissa,

OGC has provided sign-off on the attached no-action letter and cover memo. DMO would like to circulate the attached documents for absent objection review, with a review deadline of **Monday, August 11th at noon**. Please find attached: (1) no-action letter extending conditional relief for Yieldbroker until November 15, (2) cover memo, and (3) 140.98 cover sheet. Current relief for Yieldbroker pursuant to NAL 14-70 will expire on August 15th.

Please contact me once you have placed the documents into circulation, and please let me know if you have any questions or require additional information.

Kind regards,
David Pepper

David N. Pepper

Attorney-Advisor, Office of the Chief Counsel

-Division of Market Oversight, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington, DC 20581 | Tel: 202.418.5565

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, August 25, 2014 11:08 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: AO Circulation for Product Review Memo - Live Cattle

Marcia, we concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance. Thanks.

From: Blase, Marcia K.
Sent: Thursday, August 21, 2014 5:36 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir; Goggins, Jason
Subject: FW: AO Circulation for Product Review Memo - Live Cattle

(b)(5)

Please note that DMO has asked for Commission action to be completed by Friday, August 29th, and let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Thursday, August 21, 2014 8:46 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat

Subject: FW: AO Circulation for Product Review Memo - Live Cattle

Good morning,

DMO has submitted the attachment for absent objection. Please review on behalf of Commissioners Bowen and Giancarlo to determine if the may/may not participate in the review.

Please note requested completion due date: Friday, August 29th.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Lachenmayr, Christa

Sent: Wednesday, August 20, 2014 4:27 PM

To: Inbox – Secretariat

Subject: AO Circulation for Product Review Memo - Live Cattle

To Whom It May Concern,

Attached please find a product review memo for AO circulation, the subject of which is easing daily price limits in the spot month for the CME Live Cattle futures contract and specifying that delivery tenders can be submitted on Christmas Eve and New Year's Eve.

The statutory deadline for the review period is 9/2/2014. Is it possible to set the deadline for comments/objections on the close of business on 8/29? If you have any questions or need additional information, please feel free to contact me.

Thanks!

Kind regards,

Christa Lachenmayr

Designated Federal Officer, Agricultural Advisory Committee

Economist

Division of Market Oversight, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202.418.5252 | www.cftc.gov



From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, August 25, 2014 9:08 AM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: 30.7 Interpretation for AO Circulation

Amir – We concur with your analysis (b)(5)

(b)(5)

(b)(5)

Please let us know if we can be of further assistance. Thanks.

From: Zaidi, Amir
Sent: Wednesday, August 20, 2014 5:38 PM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: 30.7 Interpretation for AO Circulation

All,

(b)(5)

(b)(5)

Let me know if you have any questions.

Thanks,
Amir

From: Charley, Willie
Sent: Tuesday, August 19, 2014 2:14 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Blase, Marcia K.; Goggins, Jason; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: 30.7 Interpretation for AO Circulation

Mark/Ajay,

DSIO submitted the above documents to be entered into absent objection. If you would, please review the documents to determine the participation of Commissioners Bowen and Giancarlo. Standing by....

Thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Kuo, Francis
Sent: Tuesday, August 19, 2014 1:20 PM
To: * All Secretariat DC
Cc: Smith, Thomas J.; Barnett, Gary
Subject: 30.7 Interpretation for AO Circulation

Secretariat's Office,

Per instruction from Lawranne Stewart (see below), please AO circulate as soon as possible the attached interpretation titled:

**Commission Regulation 30.7(c) - Staff Interpretation Regarding a Futures Commission
Merchant Holding 30.7 Customer Funds in Bank Accounts with Banks Licensed in the
United Kingdom**

Attached are the interpretation and accompanying documents, including a memo to the Commission describing the interpretation, the required cover sheet, the request letter, and additional documents provided by the requesting parties.

The AO deadline should be next Wednesday, August 27, 2014. The contact in the Chairman's Office is Lawranne Stewart.

Regards,

Francis Kuo
(x5695)

From: Stewart, Lawranne
Sent: Tuesday, August 19, 2014 12:21 PM
To: Smith, Thomas J.
Cc: Kuo, Francis
Subject: RE: London Deposits

Tom – You are good to go. Thanks!

From: Smith, Thomas J.
Sent: Tuesday, August 19, 2014 9:11 AM
To: Stewart, Lawranne
Cc: Kuo, Francis
Subject: London Deposits

Lawranne,

Attached are the revised Interpretation and Commission memo incorporating OGC's comments. With your approval, we will circulate the documents to the Commission. Thanks for your assistance on this matter.

Tom.

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Friday, August 22, 2014 10:44 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: AO Circulation - DSIO Frequently Asked Question on the Volcker Rule

Ajay – We concur with your analysis (b)(5)

(b)(5) Please let us know if we can be of further assistance.
Thanks.

- Heather

From: Sutaria, Ajay
Sent: Thursday, August 21, 2014 9:30 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir
Subject: FW: AO Circulation - DSIO Frequently Asked Question on the Volcker Rule
Importance: High

(b)(5)

(b)(5)

There is an extraordinarily tight deadline on this matter; the full Commission must pass on this AO matter by **8/25** so we need the ethics review ASAP!

Thank you so much and please do not hesitate to contact me with any questions or concerns.

Ajay

From: Charley, Willie
Sent: Thursday, August 21, 2014 2:27 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: AO Circulation - DSIO Frequently Asked Question on the Volcker Rule
Importance: High

Mark/Ajay,

We have a hot one. DSIO has submitted the attached matter for absent objection. The requested deadline for circulation is Monday, 25 Aug. Please review to determine if Commissioners Bowen and Giancarlo may/may not participate. Standing by....

Thanks,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Barrett, Michael P
Sent: Thursday, August 21, 2014 12:55 PM
To: Kirkpatrick, Chris; Inbox – Secretariat
Cc: Barnett, Gary; Stewart, Lawranne; Remmler, Erik F; Driscoll, Katherine; Dumas, Cantrell; Jurgens, Melissa; Charley, Willie
Subject: AO Circulation - DSIO Frequently Asked Question on the Volcker Rule

Dear Chris,

Per the instructions of the Chairman's office, please AO circulate the attached DSIO FAQ on the Volcker Rule as soon as possible. The FAQ has been prepared in coordination with four other agencies, all of which will be ready to post their versions early next week.

We request an AO deadline of 5 p.m. on Monday, August 25. The contact in the Chairman's Office is Lawranne Stewart.

Please let us know if you have any questions.

Thank you very much.

Mike

Michael P. Barrett

Attorney-Advisor, Registration & Compliance

Division of Swap Dealer and Intermediary Oversight

U.S. Commodity Futures Trading Commission

1155 21st Street NW | Washington, DC 20581 | Tel: 202.418.5598 | mbarrett@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, August 21, 2014 12:02 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

Marcia, we agree with your analysis (b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Tuesday, August 19, 2014 5:28 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir
Subject: FW: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

(b)(5)

(b)(5)

Please let me know if you have any questions.

Marcia

From: Charley, Willie

Sent: Tuesday, August 19, 2014 4:27 PM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat

Subject: FW: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

Mark/Ajay,

DOE submitted the attached document (***Friedberg Mercantile Group***) to be entered into seriatim.
Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

Thanks so much,

Willie

From: Burr, Andrew

Sent: Tuesday, August 19, 2014 4:11 PM

To: Inbox – Secretariat

Cc: Wedewer, Harry E; Smith, Yolanda E.

Subject: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

OGC made no revisions to this recommendation.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Rosemary Hollinger.

Thank you!

Andrew

Andrew C. Burr
Financial Analyst
Division of Enforcement
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581
(202) 418-5586
(202) 418-5523 (fax)
aburr@cftc.gov

This electronic mail message and any attached files contain information intended for the exclusive use of the individual or entity to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information may be subject to legal restriction or sanction. Please notify the sender, by electronic mail or telephone, of any unintended recipients and delete the original message without making any copies.

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, August 21, 2014 11:52 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - WorldPMX

Ajay, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Sutaria, Ajay
Sent: Tuesday, August 19, 2014 1:48 PM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir
Subject: FW: Request for Seriatim Concurrence - WorldPMX

(b)(5)

(b)(5)

Let me know if you have any questions or have any concerns that should explore further.

Thanks,
Ajay

From: Charley, Willie
Sent: Tuesday, August 19, 2014 8:31 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - WorldPMX

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Monday, August 18, 2014 5:20 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - WorldPMX

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

(b)(5)

Staff point of contact is Manal Sultan.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6)

(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, August 21, 2014 11:14 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Young Scott & Associates, LLC

Ajay, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Sutaria, Ajay
Sent: Wednesday, August 13, 2014 12:27 PM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Request for Seriatim Concurrence - Young Scott & Associates, LLC

(b)(5)

(b)(5)

Let me know if you have any questions or have any concerns that should explore further.

Thanks,

Ajay

From: Charley, Willie

Sent: Wednesday, August 13, 2014 9:03 AM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Young Scott & Associates, LLC

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thank you,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Tuesday, August 12, 2014 9:39 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew

Subject: Request for Seriatim Concurrence - Young Scott & Associates, LLC

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

Staff point of contact is Rick Glaser.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, August 21, 2014 9:23 AM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

Amir based upon your analysis below, we agree (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Zaidi, Amir
Sent: Monday, August 18, 2014 5:21 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

All,

(b)(5)

(b)(5)

Please confirm.

Amir

From: Charley, Willie

Sent: Monday, August 18, 2014 3:47 PM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat

Subject: FW: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thank you,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Monday, August 18, 2014 3:02 PM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew

Subject: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

(b)(5)

Staff point of contact is Rosemary Hollinger.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, August 21, 2014 9:10 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Kraft Foods Group, Inc.

Marcia based upon your analysis below, we agree (b)(5)

(b)(5)

(b)(5) Thank you.

From: Blase, Marcia K.
Sent: Friday, August 08, 2014 10:28 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - Kraft Foods Group, Inc.

(b)(5)

Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Friday, August 08, 2014 8:28 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Kraft Foods Group, Inc.

Good morning

DOE has submitted the attached matter to be entered into seriatim circulation. Please begin an ethics/conflicts review for Commissioners Bowen and Giancarlo. Thank you.

Willie

From: Wedewer, Harry E
Sent: Thursday, August 07, 2014 4:31 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Kraft Foods Group, Inc.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

OGC made no revisions to this recommendation.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Rick Glaser.

Thank you!

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, August 21, 2014 9:06 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Morgan Stanley Smith Barney, LLC

Ajay, we agree with your analysis (b)(5)

(b)(5)



Thank you.

From: Sutaria, Ajay
Sent: Thursday, August 07, 2014 10:49 AM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Request for Seriatim Concurrence - Morgan Stanley Smith Barney, LLC

(b)(5)



(b)(5)



Let me know if you have any questions or have any concerns that should explore further.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, August 06, 2014 4:49 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Blase, Marcia K.; Goggins, Jason; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Morgan Stanley Smith Barney, LLC

Hello,

DOE has submitted the attached matter to be entered into seriatim circulation. Please begin an ethics/conflicts review for Commissioners Bowen and Giancarlo. Thank you.

Willie

From: Wedewer, Harry E
Sent: Wednesday, August 06, 2014 3:35 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Morgan Stanley Smith Barney, LLC

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Rick Glaser.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6)



(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 20, 2014 1:18 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Subject: RE: Seriatim - DOE - Request for Seriatim Concurrence - J.B. Grossman

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Wednesday, August 06, 2014 10:26 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Seriatim - DOE - Request for Seriatim Concurrence - J.B. Grossman

(b)(5)

Marcia

From: Kirkpatrick, Chris
Sent: Tuesday, August 05, 2014 3:16 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Blase, Marcia K.; Goggins, Jason; Inbox – Secretariat
Subject: Seriatim - DOE - Request for Seriatim Concurrence - J.B. Grossman

Good Afternoon,

DOE has submitted the attached matter to be entered into seriatim circulation. Please begin an ethics/conflicts review for Commissioners Bowen and Giancarlo. Thank you.

Chris

From: Wedewer, Harry E
Sent: Tuesday, August 05, 2014 2:42 PM
To: Inbox – Secretariat
Cc: Burr, Andrew; Smith, Yolanda E.
Subject: Request for Seriatim Concurrence - J.B. Grossman

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter, they are unaware of:

(b)(5)

Staff point of contact is Scott Williamson.

Thank you!

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 20, 2014 12:48 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Zulutrade, Inc.

Ajay, we agree with your analysis (b)(5)

(b)(5)

(b)(5) Thank you.

From: Sutaria, Ajay
Sent: Thursday, August 07, 2014 10:22 AM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Request for Seriatim Concurrence - Zulutrade, Inc.

(b)(5)

(b)(5)

Let me know if you have any questions or have any concerns that should explore further.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, August 06, 2014 11:01 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Blase, Marcia K.; Goggins, Jason; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Zulutrade, Inc.

Good morning,

DOE has submitted the attached matter to be entered into seriatim circulation. Please begin an ethics/conflicts review for Commissioners Bowen and Giancarlo. Thank you.

Willie

From: Wedewer, Harry E
Sent: Tuesday, August 05, 2014 10:00 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Zulutrade, Inc.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)

(b)(5)

Staff point of contacts are Rosemary Hollinger or Scott Williamson.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 20, 2014 12:02 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Glen Galemmo

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5) Thank you.

From: Blase, Marcia K.
Sent: Wednesday, August 06, 2014 10:40 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - Glen Galemmo

(b)(5)

Marcia

From: Kirkpatrick, Chris
Sent: Tuesday, August 05, 2014 3:21 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Blase, Marcia K.; Goggins, Jason; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Glen Galemmo

Good Afternoon,

DOE has submitted the attached matter to be entered into seriatim circulation. Please begin an ethics/conflicts review for Commissioners Bowen and Giancarlo. Thank you.

Chris

From: Wedewer, Harry E
Sent: Tuesday, August 05, 2014 3:01 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Glen Galemmo

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter, they are unaware of:

(b)(5)



Staff point of contact is Paul Hayeck.

Thank you!

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 20, 2014 11:40 AM
To: Zaidi, Amir <AZaidi@CFTC.gov>
Cc: Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

Amir, we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Zaidi, Amir
Sent: Monday, August 18, 2014 5:21 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

All,

(b)(5)

(b)(5)

Please confirm.

Amir

From: Charley, Willie
Sent: Monday, August 18, 2014 3:47 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Monday, August 18, 2014 3:02 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Kent Woods and Futures International, LLC et al.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Rosemary Hollinger.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)



From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 20, 2014 8:22 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>
Subject: RE: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

Marcia, we agree (b)(5)

(b)(5)

Thanks.

From: Blase, Marcia K.
Sent: Tuesday, August 19, 2014 5:28 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Zaidi, Amir
Subject: FW: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

(b)(5)

Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Tuesday, August 19, 2014 4:27 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Zaidi, Amir; Dolan, John; Gottry, Heather; Marcus, Jonathan L.;
Inbox – Secretariat
Subject: FW: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

Mark/Ajay,

DOE submitted the attached document (***Friedberg Mercantile Group***) to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

Thanks so much,

Willie

From: Burr, Andrew
Sent: Tuesday, August 19, 2014 4:11 PM
To: Inbox – Secretariat
Cc: Wedewer, Harry E; Smith, Yolanda E.
Subject: DOE Request for Seriatim Concurrence - Friedberg Mercantile Group

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

OGC made no revisions to this recommendation.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Rosemary Hollinger.

Thank you!

Andrew

Andrew C. Burr
Financial Analyst
Division of Enforcement
U.S. Commodity Futures Trading Commission

Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581
(202) 418-5586
(202) 418-5523 (fax)
aburr@cftc.gov

This electronic mail message and any attached files contain information intended for the exclusive use of the individual or entity to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information may be subject to legal restriction or sanction. Please notify the sender, by electronic mail or telephone, of any unintended recipients and delete the original message without making any copies.

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, August 19, 2014 2:11 PM
To: Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Brian Hunter

Marcia, we agree with your analysis (b)(5)

(b)(5)

(b)(5) Thank you.

From: Blase, Marcia K.
Sent: Wednesday, August 13, 2014 12:45 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Goggins, Jason
Subject: RE: Request for Seriatim Concurrence - Brian Hunter

(b)(5)

Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Tuesday, August 12, 2014 4:31 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Brian Hunter

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Tuesday, August 12, 2014 4:12 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Brian Hunter

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Manal Sultan.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, August 19, 2014 11:29 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Seriatim - DOE - Request for Seriatim Concurrence - Trading in Advance of Bank Ratings Announcement (Barclays Capital, Inc. et al.)

Ajay, we agree

(b)(5)

(b)(5)

(b)(5)

Thanks.

From: Sutaria, Ajay
Sent: Thursday, July 31, 2014 4:57 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Seriatim - DOE - Request for Seriatim Concurrence - Trading in Advance of Bank Ratings Announcement (Barclays Capital, Inc. et al.)

(b)(5)

(b)(5)

Let me know if you have any questions or have any concerns that should explore further.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, July 30, 2014 11:56 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Inbox – Secretariat
Subject: Seriatim - DOE - Request for Seriatim Concurrence - Trading in Advance of Bank Ratings Announcement (Barclays Capital, Inc. et al.)

Hello,

DOE submitted the attached document (*Barclays Capital, Inc. et al.*) to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

Thanks so much,

Willie

From: Wedewer, Harry E
Sent: Tuesday, July 29, 2014 10:44 AM
To: Inbox – Secretariat
Cc: Burr, Andrew; Smith, Yolanda E.
Subject: Request for Seriatim Concurrence - Trading in Advance of Bank Ratings Announcement (Barclays Capital, Inc. et al.)

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

Staff point of contact is Manal Sultan.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6)

(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, August 19, 2014 8:14 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Subject: RE: SOUTHWEST POWER POOL NO-ACTION EXTENSION LETTER

Marcia we agree with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Friday, August 15, 2014 4:07 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Goggins, Jason
Subject: FW: SOUTHWEST POWER POOL NO-ACTION EXTENSION LETTER

(b)(5)

Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Friday, August 15, 2014 2:56 PM
To: Sutaria, Ajay; Fajfar, Mark
Cc: Goggins, Jason; Blase, Marcia K.; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: SOUTHWEST POWER POOL NO-ACTION EXTENSION LETTER

Mark/Ajay,

DCR submitted the attached no-action letter (Southwest Power Pool) to be entered into absent objection. Please conduct an ethics review on behalf of your respective Commissioner please.

Also, please note the requested due date time: Friday, August 22, 2014 @ 12 Noon.

Thanks much,

Willie

From: Astrada, Laura
Sent: Friday, August 15, 2014 1:38 PM
To: Inbox – Secretariat
Cc: Wasserman, Robert B.; Van Wagner, David; Lewis, Alicia L.; Adriance, Riva; Griffin, Ward P
Subject: SOUTHWEST POWER POOL NO-ACTION EXTENSION LETTER

Attached please find a No-Action Extension Letter for Southwest Power Pool. Could you please circulate this advisory to the Commission with an absent objection deadline of **12:00 noon on Friday, August 22, 2014**? I also understand that there needs to be a recusal check for the new Commissioners. Please let us know if you need any information to facilitate that process. Please let me know if you have any questions.

Best,
Laura

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Monday, August 18, 2014 5:09 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>; Fajfar, Mark <MFajfar@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Cc: Blase, Marcia K. <mblase@CFTC.gov>; Zaidi, Amir <AZaidi@CFTC.gov>
Subject: RE: Seriatim

We agree with both of you (b)(5) Thank you.

From: Sutaria, Ajay
Sent: Monday, August 18, 2014 5:06 PM
To: Fajfar, Mark; Dolan, John
Cc: Gottry, Heather; Blase, Marcia K.; Zaidi, Amir
Subject: RE: Seriatim

(b)(5)

Thanks,
Ajay

From: Fajfar, Mark
Sent: Monday, August 18, 2014 4:36 PM
To: Dolan, John
Cc: Gottry, Heather; Blase, Marcia K.; Sutaria, Ajay
Subject: RE: Seriatim

(b)(5)

Please confirm.

From: Charley, Willie
Sent: Monday, August 18, 2014 4:26 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Goggins, Jason; Blase, Marcia K.; Charley, Willie
Subject: FW: Seriatim

Mark/Ajay,

OED has submitted the attached matter to be entered into seriatim. I know this is an internal document; however, I need your confirmation on participation of Commissioners Bowen and Giancarlo for the record. Standing by....

Thank you,

Willie
Willie Charley
Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Jurgens, Melissa
Sent: Monday, August 18, 2014 3:57 PM
To: Inbox – Secretariat
Cc: Lindsay, Laurie
Subject: FW: Seriatim

Attached is a seriatim for processing. Please contact Laurie Lindsay if you have any questions or need anything else.

Thanks,
Melissa

From: Lindsay, Laurie
Sent: Monday, August 18, 2014 3:56 PM
To: Jurgens, Melissa
Subject: Seriatim

Hi Melissa,

Attached is the seriatim for the Parking and Transit Subsidy. Can you put it into clearance? I believe you have a mailbox but I could not locate it in the global address list...

Laurie Lindsay
Chief Human Capital Officer

Human Resources Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202.418.5625 | Email: llindsay@cftc.gov



Committed to Excellence!

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, August 18, 2014 2:42 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: AO - SCREENING - DSIO - FHFA Request for No-Action Relief for Fannie Mae and Freddie Mac

Ajay, OGC agrees with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Sutaria, Ajay
Sent: Thursday, July 31, 2014 4:45 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: AO - SCREENING - DSIO - FHFA Request for No-Action Relief for Fannie Mae and Freddie Mac

(b)(5)

Please let me know if you have any questions.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, July 30, 2014 3:49 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Inbox – Secretariat
Subject: AO - SCREENING - DSIO - FHFA Request for No-Action Relief for Fannie Mae and Freddie Mac

Hello,

Today, July 30, 2014, DSIO submitted the attached no-action letter (***FHFA Request for No-Action Relief for Fannie Mae and Freddie Mac***) to be entered into absent objection. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo in regards to this matter.

Requested Due Date/Time: Wednesday, August 6, 2014 @ 12 Noon.

V/r,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Groover, Elizabeth
Sent: Wednesday, July 30, 2014 3:10 PM
To: Inbox – Secretariat
Cc: Barnett, Gary; Remmler, Erik F; Olear, Amanda L; Stewart, Lawranne
Subject: FHFA Request for No-Action Relief for Fannie Mae and Freddie Mac

Please find attached a no-action letter that DSIO intends to issue to the Federal Housing Finance Agency, granting no-action relief to Fannie Mae and Freddie Mac from registration as commodity pool operators with regard to their operation of a specific mortgage credit risk-sharing initiative. Please place this into absent objection upon Lawranne Stewart's release. The deadline should be set for noon on Wednesday, August 6, 2014.

Also attached are the incoming request, supplemental submissions by the requester, and a brief memo to the Commission summarizing the letter. Please do not hesitate to contact us with any questions or concerns you might have.

Elizabeth M. Groover
Special Counsel
Division of Swap Dealer and Intermediary Oversight, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202.418.5985 | Fax: 202.418.5407 |
egroover@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, August 15, 2014 9:19 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Subject: RE: Seriatim Request - NFA Amendments to Articles of Incorporation to Increase CPO/CTA representation on NFA's Board of Directors

Marcia, thank you. We concur that the proposed changes (b)(5)

(b)(5)

(b)(5)

(b)(5)

From: Blase, Marcia K.
Sent: Wednesday, August 13, 2014 4:34 PM
To: Dolan, John
Cc: Sutaria, Ajay
Subject: FW: Seriatim Request - NFA Amendments to Articles of Incorporation to Increase CPO/CTA representation on NFA's Board of Directors

(b)(5)

I left you a voicemail, but no need to call unless you would like to discuss further.

Marcia

From: Blase, Marcia K.
Sent: Wednesday, August 13, 2014 2:29 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Jason M. Goggins (JGoggins@CFTC.gov)
Subject: FW: Seriatim Request - NFA Amendments to Articles of Incorporation to Increase CPO/CTA representation on NFA's Board of Directors

(b)(5)



Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Wednesday, August 13, 2014 1:21 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: Seriatim Request - NFA Amendments to Articles of Incorporation to Increase CPO/CTA representation on NFA's Board of Directors

Mark/Ajay,

DSIO requests the attached documents (NFA Amendments to Articles of Incorporation to Increase CPO & CTA Representation on NFA's Board of Directors) be entered into seriatim. If you would, please review the document to determine if Commissioners Bowen and Giancarlo may/may not participate in this matter.

Standing by...thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, August 14, 2014 12:10 PM
To: Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Cc: Sutaria, Ajay <ASutaria@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>
Subject: RE: FY 2014-FY 2018 Strategic Plan submission to seriatim

Marcia – We concur with you. Please let us know if we can be of further assistance. Thank you.

- Heather

From: Blase, Marcia K.
Sent: Thursday, August 14, 2014 11:47 AM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Sutaria, Ajay; Goggins, Jason
Subject: FW: FY 2014-FY 2018 Strategic Plan submission to seriatim

(b)(5)



Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Thursday, August 14, 2014 11:32 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: FY 2014-FY 2018 Strategic Plan submission to seriatim

Mark/Ajay,

OED has submitted the attached matter (FY 2014-FY 2018 Strategic Plan) to be entered into seriatim. In keeping with established protocol, I am sending to you to ensure Commissioners Bowen and Giancarlo may/may not participate in this matter.

The requested due date for complete circulation is: Monday, September 15, 2014.

Standing by and thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Paulsen, Tina

Sent: Thursday, August 14, 2014 10:39 AM

To: Inbox – Secretariat

Cc: Charley, Willie; Kirkpatrick, Chris; James, Luis; Thompson, Anthony C.; Smith, Michael; Jurgens, Melissa

Subject: Strategic Plan submission to seriatim

Willie,

Please see the attached Strategic Plan PDF and memo for submission into seriatim. Tony would like to input a target date of 9/15/14 for all of the offices to sign off.

In conjunction with this, OED will deliver a courtesy hard copy of the Strategic Plan to the Chairman's front office today.

Thank You,

Tina Paulsen

Program Analyst, Strategic and Operational Planning

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington, DC 20581 | Tel: 202.418.5908 | Room 4202

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 13, 2014 1:02 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - American Bullion Exchange ABEX, Corp., American Bullion Exchange, LLC and Ryan A. Nassbridges

Ajay, OGC agrees with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Sutaria, Ajay
Sent: Wednesday, August 13, 2014 9:42 AM
To: Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Request for Seriatim Concurrence - American Bullion Exchange ABEX, Corp., American Bullion Exchange, LLC and Ryan A. Nassbridges

(b)(5)

Let me know if you have any questions or have any concerns that should explore further. Due to court deadlines, staff has requested prompt action on this seriatim, and accordingly we respectfully request that you prioritize the ethics screening for this matter.

Thanks,
Ajay

From: Charley, Willie
Sent: Tuesday, August 12, 2014 4:30 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Goggins, Jason; Blase, Marcia K.; Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - American Bullion Exchange ABEX, Corp., American Bullion Exchange, LLC and Ryan A. Nassbridges

Mark/Ajay,

DOE submitted the attached matter to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Please note requested completion date of **Monday, August 18th** by the Commission.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Tuesday, August 12, 2014 3:58 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - American Bullion Exchange ABEX, Corp., American Bullion Exchange, LLC and Ryan A. Nassbridges

Please find the attached DOE recommendation submitted for Seriatim Concurrence. **Commission approval by Monday, August 18th is requested in order to meet a court filing deadline.**

OGC made no revisions to this recommendation.

Please note that because this is an amended complaint recommendation, it contains both redline and clean versions of the complaint.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Paul Hayeck.

Thank you!

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, August 13, 2014 9:54 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>
Subject: RE: Draft No-Action Letter - Clearing Corporation of India Ltd. (CCIL)

Ajay, OGC agrees with your analysis (b)(5)

(b)(5)

(b)(5) Thank you.

From: Sutaria, Ajay
Sent: Tuesday, August 12, 2014 10:46 AM
To: Gottry, Heather; Dolan, John
Cc: Blase, Marcia K.; Charley, Willie
Subject: FW: Draft No-Action Letter - Clearing Corporation of India Ltd. (CCIL)

Heather and John,

I understand from the Secretariat that the time remaining on this no-action letter is growing short; I was hoping you might be able to review my analysis below and let us know whether you think Commissioner may participate in this matter consistent with his ethical obligations.

Per the attached email, DCR has requested the full Commission complete its absent objection review by next Monday, August 18. Until we complete ethics screening, the matter cannot be circulated to the full Commission for absent objection review. I would appreciate anything you can do to expedite your consideration of this matter.

Thanks so much!

From: Sutaria, Ajay
Sent: Monday, August 04, 2014 11:24 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Draft No-Action Letter - Clearing Corporation of India Ltd. (CCIL)

(b)(5)

(b)(5)



Please let me know if you have any questions.

Thanks,
Ajay

From: Donovan, Eileen A.

Sent: Monday, August 04, 2014 11:05 AM

To: Kim, Carlene; Lowe, Gretchen L.

Cc: Dietz, Phyllis; Durrani, Shawn R.; Griffin, Ward P; Ogilvie, Clark; Stewart, Lawranne; Pham, Caroline; Rozenberg, Bella; Zaidi, Amir; Cisewski, Joseph R; Reinhart, Scott; Blase, Marcia K.; Sutaria, Ajay; Fajfar, Mark

Subject: Draft No-Action Letter - Clearing Corporation of India Ltd. (CCIL)

All:

On July 15th, 2014, CCIL submitted to DCR a request for temporary, limited no-action relief from the requirement that it register as a DCO in order to provide clearing services for U.S. persons (the request is attached). Over the past several months, DCR has issued no-action letters to clearing organizations in Korea, Hong Kong, and Australia in response to similar requests.

Attached for your review is a draft no-action letter that DCR intends to circulate to the Commission for absent objection. Please provide any comments you may have by COB Wednesday, August 6, 2014. Please contact me (x5096) or Shawn Durrani (x5048) if you have any questions (Shawn is currently out of the office but will return tomorrow). Thank you very much.

Eileen

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, August 12, 2014 8:15 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Worth Group, Inc.

Thanks Marcia. OGC concurs with your analysis (b)(5)

(b)(5)

From: Blase, Marcia K.
Sent: Thursday, August 07, 2014 10:33 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - Worth Group, Inc.

(b)(5)

Please let me know if you have any questions.

Marcia

From: Charley, Willie
Sent: Wednesday, August 06, 2014 5:03 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Blase, Marcia K.; Goggins, Jason; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Worth Group, Inc.

Hello,

DOE has submitted the attached matter to be entered into seriatim circulation. Please begin an ethics/conflicts review for Commissioners Bowen and Giancarlo. Thank you.

Willie

From: Wedewer, Harry E
Sent: Wednesday, August 06, 2014 4:38 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Worth Group, Inc.

Please find the attached DOE recommendation submitted for Seriatim Concurrence. **Commission approval by 8/14 is requested.**

There were no revisions to this recommendation by OGC.

Please note that the proposed revisions to the amended complaint contained in this recommendation (Exhibit A) are highlighted.

For conflicts/ethics screening, it is my understanding from staff that regarding this matter they are unaware of:

(b)(5)



Staff point of contact is Rosemary Hollinger.

Thank you!

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Friday, August 8, 2014 1:58 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: DOE Revised INJ Filing Rec. - Ralph Metters (Destiny FX LLC, Atlas4x.com, Moe Levy - CPO/CTA)

Marcia - With apologies for the delay in responding, we concur with the analysis and conclusion below. Please do not hesitate let me know if it would be helpful to discuss further. Thank you.

- Heather

From: Blase, Marcia K.
Sent: Wednesday, August 06, 2014 3:34 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: RE: DOE Revised INJ Filing Rec. - Ralph Metters (Destiny FX LLC, Atlas4x.com, Moe Levy - CPO/CTA)

Jonathan or Heather. We just got word from Enforcement that they have forwarded this matter to the Secretariat's office, which will be awaiting our response on the ethics screening. They are asking for sign-off by Friday, so we will need to brief the Commissioner on this by tomorrow. Please let me know if you need further information.

Thanks,
Marcia

From: Blase, Marcia K.
Sent: Tuesday, August 05, 2014 10:26 AM
To: Marcus, Jonathan L.; Gottry, Heather
Subject: FW: DOE Revised INJ Filing Rec. - Ralph Metters (Destiny FX LLC, Atlas4x.com, Moe Levy - CPO/CTA)
Importance: High

(b)(5)

(b)(5)

The Commission approved the filing of the complaint on April 14, 2014, but the Division of Enforcement refrained from filing it at that time at the request of the U.S. Attorney's office to give the FBI agent assigned to a parallel criminal investigation of Metters time to complete her investigation. The Division now expects to file this action on August 8, 2014 (this coming Friday).

(b)(5)

(b)(5)

(b)(5)

Given the expedited nature of this matter your prompt attention would be appreciated.

Thanks, and let me know if you have any questions.

Marcia

From: Charley, Willie

Sent: Tuesday, August 05, 2014 8:19 AM

To: Fajfar, Mark; Sutaria, Ajay

Cc: Goggins, Jason; Blase, Marcia K.; Inbox – Secretariat

Subject: FW: DOE Revised INJ Filing Rec. - Ralph Metters (Destiny FX LLC, Atlas4x.com, Moe Levy - CPO/CTA)

Importance: High

Mark/Ajay,

Good morning, I'm just trying to be a little proactive. Please see the advanced copy of the above subject matter that will be submitted by DOE with a projected due date through the Commission of this Friday, August 8th (a very quick turnaround). Would it be possible to peruse the attachments and determine if Commissioners Bowen and Giancarlo may/may not participate?

Thanks so much,

Willie

From: Wedewer, Harry E

Sent: Monday, August 04, 2014 5:43 PM

To: Griffin, Ward P

Cc: Lowe, Gretchen L.; Williamson, Scott R.; Kirkpatrick, Chris; Charley, Willie; Gould, Ava M.; Smiley, Jennifer; Smith, Yolanda E.; Burr, Andrew

Subject: DOE Revised INJ Filing Rec. - Ralph Metters (Destiny FX LLC, Atlas4x.com, Moe Levy - CPO/CTA)

Importance: High

Ward:

As a heads-up, I anticipate that tomorrow I will be forwarding to the Secretariat, for consideration by the Commission, the attached recommendation that the Commission authorize DOE to file a revised

version of this previously-approved, but yet-to-be-filed action (memo and redline complaint attached). This recommendation was previously approved by the Commission 4/14, however, as explained below it was held at the request of criminal authorities (please see Scott W.'s email below for a description of the changes).

We will be seeking Commission approval of this recommendation by this Friday, 8/8. Realizing that the Chairman is out, I will touch base with you tomorrow when I am back in the office about how to best proceed.

As a final note, I have also sent this to Rob and Maria to see if they have any comment/objection. As background, we give OGC an opportunity to comment on these types of revisions – depending on the extent or circumstance of the revision, they may or may not formally sign-off and instead will notify us that they do not have an issue. In any case, I will let you know of any comments they may have.

Harry

From: Williamson, Scott R.
Sent: Monday, August 04, 2014 11:01 AM
To: Wedewer, Harry E; Lowe, Gretchen L.
Cc: Gould, Ava M.; Smiley, Jennifer
Subject: {Destiny FX LLC, Atlas4x.com, Moe Levy - CPO/CTA}
Importance: High

Harry and Gretchen,

We're seeking expedited Commission consideration of a request to modify the allegations to a previously-authorized, but not yet filed complaint, to allow us to file this Friday.

(b)(5)
(b)(5) We're now looking to file this Friday, August 8. Since the
Commission approved the filing, (b)(5)
(b)(5)
(b)(5) We'd like to get expedited authority to make the change. Thanks.

Scott

Scott R. Williamson
Deputy Regional Counsel
CFTC Division of Enforcement
525 W Monroe Street, Suite 1100
Chicago, IL 60661
(312) 596-0560
swilliamson@cftc.gov
www.cftc.gov

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 31, 2014 4:59 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - CBOT May 2013 Corn Futures

Marcia - We concur with the analysis below. Please let me know if it would be helpful to discuss further. Thank you.

- Heather

From: Blase, Marcia K.
Sent: Thursday, July 31, 2014 12:50 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - CBOT May 2013 Corn Futures

(b)(5)



Please let me know if you have any questions.

Thanks,
Marcia

From: Charley, Willie
Sent: Thursday, July 31, 2014 9:21 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Inbox –

Secretariat

Subject: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - CBOT May 2013 Corn Futures

Good morning,

DOE has submitted the attached document (***CBOT May 2013 Corn Futures***) for seriatim circulation. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo to determine if they may/may not participate in this matter.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Wednesday, July 30, 2014 5:42 PM

To: Inbox – Secretariat

Cc: Burr, Andrew; Smith, Yolanda E.

Subject: Request for Seriatim Concurrence - CBOT May 2013 Corn Futures

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

Staff point of contact is Rick Glaser.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 31, 2014 4:31 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>
Subject: RE: Seiatim - ETHICS SCREENING - OGC Adjudicatory Program: Reparations Appeal -- Yrag Trader Options Memo

Marcia - We agree with the analysis below. Please let me know if it would be helpful to discuss further. Thank you.

- Heather

From: Blase, Marcia K.
Sent: Monday, July 28, 2014 11:09 AM
To: Dolan, John; Gottry, Heather; Marcus, Jonathan L.
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Seiatim - ETHICS SCREENING - OGC Adjudicatory Program: Reparations Appeal -- Yrag Trader Options Memo

(b)(5)



From: Charley, Willie
Sent: Friday, July 25, 2014 10:47 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: Seiatim - ETHICS SCREENING - OGC Adjudicatory Program: Reparations Appeal -- Yrag Trader Options Memo

Mark/Ajay,

Today, July 25, 2014, OGC submitted the attached documents to be entered into seriatim. Please conduct ethics screening on behalf of Commissioners Bowen and Giancarlo.

V/r,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Doyle, Nancy

Sent: Friday, July 25, 2014 10:15 AM

To: Inbox – Secretariat

Cc: Proctor, William N

Subject: OGC Adjudicatory Program: Reparations Appeal -- Yrag Trader Options Memo

Attached for circulation is the Yrag Traders options memo.

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 31, 2014 4:23 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Coinflip, Inc.

Ajay - We agree with the analysis below. Please let me know if it would be helpful to discuss further. Thank you.

- Heather

From: Sutaria, Ajay
Sent: Monday, July 28, 2014 2:36 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Coinflip, Inc.

(b)(5)



Let me know if you have any questions or have any concerns that should explore further.

Thanks,
Ajay

From: Charley, Willie
Sent: Monday, July 28, 2014 11:22 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Coinflip, Inc.

Good morning,

28 Jul 14 – The Division of Enforcement submitted the attached document (**Coinflip, Inc.**) to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Friday, July 25, 2014 6:00 PM
To: Inbox – Secretariat
Cc: Burr, Andrew; Smith, Yolanda E.
Subject: Request for Seriatim Concurrence - Coinflip, Inc.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

Staff point of contact is Manal Sultan.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 31, 2014 4:20 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - Merrill Lynch, Pierce, Fenner & Smith Inc.

Ajay - We agree with the analysis below. Please let me know if it would be helpful to discuss further. Thank you.

- Heather

From: Sutaria, Ajay
Sent: Wednesday, July 30, 2014 5:19 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Request for Seriatim Concurrence - Merrill Lynch, Pierce, Fenner & Smith Inc.

(b)(5)



(b)(5)



(b)(5)



(b)(5)

Let me know if you have any questions or have any concerns that should explore further.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, July 30, 2014 8:43 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Inbox – Secretariat
Subject: FW: Request for Seriatim Concurrence - Merrill Lynch, Pierce, Fenner & Smith Inc.

Good morning,

Today, 30 July 14, the Division of Enforcement submitted the attached document (Merrill Lynch, Pierce, Fenner & Smith Inc.) to be entered into seriatim. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo. Standing by.

Thank you,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Tuesday, July 29, 2014 5:05 PM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Merrill Lynch, Pierce, Fenner & Smith Inc.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

For conflicts/ethics screening, it is my understanding from staff:

(b)(5)

Staff point of contact is Rosemary Hollinger.

Thank you very much.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6) (cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 31, 2014 4:07 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: Seriatim - SCREENING - OGC - Request to Compromise a Bankruptcy Proof of Claim

Marcia – We agree with the analysis below. Please let me know if it would be helpful to discuss further. Thank you.

- Heather

From: Blase, Marcia K.
Sent: Wednesday, July 23, 2014 1:21 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Seriatim - SCREENING - OGC - Request to Compromise a Bankruptcy Proof of Claim
Importance: High

(b)(5)



Please let me know if you have any questions.

Thanks,
Marcia

From: Charley, Willie
Sent: Wednesday, July 23, 2014 10:09 AM
To: Fajfar, Mark; Sutaria, Ajay

Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie

Subject: Seriatim - SCREENING - OGC - Request to Compromise a Bankruptcy Proof of Claim

Importance: High

Mark/Ajay,

Today, July 23rd, OGC submitted the attached document for seriatim, Request to Compromise a Bankruptcy Proof of Claim. Please conduct screening on behalf of Commissioners Bowen and Giancarlo.

Thanks much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Doyle, Nancy

Sent: Tuesday, July 22, 2014 01:50 PM

To: Kirkpatrick, Chris

Subject: This is ready for seriatim circulation. We have asked for a vote by August 20th.

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, July 28, 2014 7:12 AM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DMO - Part 30.13 Memo to the Commission for Seriatim Signoff

Marcia, OGC agrees with your analysis (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Blase, Marcia K.
Sent: Tuesday, July 22, 2014 5:45 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Seriatim - SCREENING - DMO - Part 30.13 Memo to the Commission for Seriatim Signoff

(b)(5)

Please let me know if you have any questions.

Thanks,
Marcia

From: Charley, Willie
Sent: Tuesday, July 22, 2014 12:04 PM
To: Fajfar, Mark; Sutaria, Ajay

Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: Seriatim - SCREENING - DMO - Part 30.13 Memo to the Commission for Seriatim Signoff

Mark/Ajay,

Today, July 22, 2014, DMO submitted the attached for seriatim circulation. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Colling, Philip

Sent: Tuesday, July 22, 2014 11:14 AM

To: Inbox – Secretariat

Subject: Part 30.13 Memo to the Commission for Seriatim Signoff

Attached is a Memorandum to the Commission regarding a Part 30.13 certification allowing a stock index futures contract on a foreign entity to be traded by U.S. persons. Also attached is a word version of the letter that will be sent to the London Stock Exchange.

Phil

Phil Colling, Ph.D.

Assistant Director, Product Review, Financial Products Group

Commodity Futures Trading Commission

1155 21st Street NW

Washington, DC 20581

T 202-418-5287

F 202-418-5708

pcolling@cftc.gov www.cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, July 25, 2014 4:58 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - RFF GP, LLC et al.

Ajay based upon your analysis below, (b)(5)
(b)(5) we
agree (b)(5) Thank you.

From: Sutaria, Ajay
Sent: Wednesday, July 23, 2014 8:58 PM
To: Marcus, Jonathan L.; Dolan, John; Gottry, Heather
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Request for Seriatim Concurrence - RFF GP, LLC et al.

(b)(5)

Please let me know if you have any questions.

Thank you,

Ajay

From: Charley, Willie
Sent: Wednesday, July 23, 2014 3:09 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: FW: Request for Seriatim Concurrence - RFF GP, LLC et al.

Mark/Ajay,

Today, July 23, 2014, the Division of Enforcement submitted the attached to be entered into seriatim. Please conduct the ethics review on behalf of Commissioners Bowen and Giancarlo.

Standing by...thanks,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Wednesday, July 23, 2014 1:51 PM
To: Inbox – Secretariat
Subject: Request for Seriatim Concurrence - RFF GP, LLC et al.

Please find the attached DOE recommendation submitted for Seriatim Concurrence. **Commission approval is requested by Wednesday, August 13, 2014, in order to comply with a court deadline.**

OGC had no revisions to this recommendation. (b)(5)

(b)(5)

OGC was made aware of this change and had no issue with it.

With respect to conflicts:

(b)(5)

Staff point of contact is Paul Hayeck or Harry Wedewer

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, July 25, 2014 4:29 PM
To: Blase, Marcia K. <mblase@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Request for Seriatim Concurrence - FirstRand Bank, Ltd.

Marcia based upon your analysis below, we agree (b)(5)

(b)(5) Thank you.

From: Blase, Marcia K.
Sent: Thursday, July 24, 2014 9:50 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Sutaria, Ajay
Subject: FW: Request for Seriatim Concurrence - FirstRand Bank, Ltd.

(b)(5)

Please let me know if you have any questions.

Thanks, Marcia

From: Charley, Willie
Sent: Wednesday, July 23, 2014 3:32 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: FW: Request for Seriatim Concurrence - FirstRand Bank, Ltd.

Mark/Ajay,

Today, July 23, 2014 – The Division of Enforcement submitted the attached document to be entered into the seriatim process. Please conduct an ethics review on behalf of Commissioners Bowen and Giancarlo.

Thanks and standing by....

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Wednesday, July 23, 2014 2:53 PM

To: Inbox – Secretariat

Cc: Burr, Andrew; Smith, Yolanda E.

Subject: Request for Seriatim Concurrence - FirstRand Bank, Ltd.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

With respect to conflicts, it is my understanding from staff that:

(b)(5)

Staff point of contact is Chuck Marvine.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Friday, July 25, 2014 4:08 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Gottry, Heather <HGottry@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Parnon Energy Inc. (Arcadia)

Thanks Ajay. We agree (b)(5)

(b)(5)

From: Sutaria, Ajay
Sent: Wednesday, July 23, 2014 10:59 AM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Parnon Energy Inc. (Arcadia)
Importance: High

(b)(5)

(b)(5)

In view of the of an impending court deadline described in the email from ENF below, there is limited time for ethics review and ultimate disposition of this matter. Accordingly, we greatly appreciate you expediting this matter.

Let me know if you have any questions.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, July 23, 2014 9:06 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Parnon Energy Inc. (Arcadia)
Importance: High

Mark/Ajay,

The Division of Enforcement has submitted the attached document for seriatim, CFTC v. Parnon Energy, Inc. Please review for recusal/conflict on behalf of Commissioners Bowen and Giancarlo.

Standing by,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Tuesday, July 22, 2014 4:48 PM
To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew

Subject: Request for Seriatim Concurrence - Parnon Energy Inc. (Arcadia)

Please find the attached DOE recommendation submitted for Seriatim Concurrence. **Commission approval is requested by Friday, August 1, 2014, in order to comply with a court deadline.**

There were no revisions to this recommendation by OGC.

With respect to conflicts, it is my understanding from staff that:

(b)(5)



Staff point of contact is Paul Hayeck.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
 (cell)

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 24, 2014 4:52 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Cc: Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: FW: DOE Admin File and Settle Rec. - Lloyds Banking Group, plc

With apologies, it appears that the message below was not copied to all relevant parties. The analysis below reflects John's review of the issue and is consistent with the analysis previously provided by Ajay. Please accept our apologies for the delay. Thank you.

- Heather

From: Dolan, John
Sent: Thursday, July 24, 2014 3:00 PM
To: Gottry, Heather
Subject: RE: DOE Admin File and Settle Rec. - Lloyds Banking Group, plc

Ajay thank you for your emails. We agree with your analysis (b)(5)

(b)(5)

(b)(5) Thanks.

From: Sutaria, Ajay
Sent: Tuesday, July 22, 2014 9:30 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: DOE Admin File and Settle Rec. - Lloyds Banking Group, plc
Importance: High

(b)(5)

(b)(5)

(b)(5)

(b)(5) there is limited time for ethics review and ultimate disposition of this matter. Accordingly, we greatly appreciate you expediting this matter.

Let me know if you have any questions.

Thanks,
Ajay

From: Wedewer, Harry E

Sent: Tuesday, July 22, 2014 1:42 PM

To: Griffin, Ward P; Reinhart, Scott; Cisewski, Joseph R; Serafini, Ted; Barrett, Danielle; Blase, Marcia K.; Sutaria, Ajay; Goggins, Jason; Fajfar, Mark; Dolan, John; Gottry, Heather

Cc: Goelman, Aitan; Lowe, Gretchen L.; Termine, Anne; Kirkpatrick, Chris; Holden, Dennis W.; Faulk-White, Donna; Charley, Willie; Burr, Andrew; Smith, Yolanda E.

Subject: DOE Admin File and Settle Rec. - Lloyds Banking Group, plc

Importance: High

Legal Assistants:

Attached is an advance copy of a DOE recommendation that the Commission simultaneously file and settle an administrative enforcement action against **Lloyds Banking Group, plc**. The Division anticipates submitting this recommendation to the Secretariat by Wednesday or Thursday.

Please note that DOE will be seeking Commission approval of this recommendation by COB Monday, July 28, 2014. The Division will be seeking approval by this date in order to file this action in coordination with other authorities early on Tuesday, July 29, 2014.

Counsel is Hogan Lovells and the attorneys are: Jon Holland and Marc Gottridge, Megan Dixon, and Ailbhe Edgar.

The corporate names involved are: Lloyds Banking Group, plc -- formerly Lloyds TSB Group plc, its subsidiaries and former subsidiaries including Lloyds Bank plc -- formerly Lloyds TSB Bank plc, HBOS plc and its subsidiary Bank of Scotland plc.

Please contact Gretchen or Anne if you have questions or require a briefing.

Thank you very much.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, July 22, 2014 10:08 AM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: AO - SCREENING - DSIO - Credit Suisse VPP letter 772014

Ajay we agree (b)(5)

(b)(5)

(b)(5)

Thanks.

From: Sutaria, Ajay
Sent: Sunday, July 20, 2014 9:28 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: AO - SCREENING - DSIO - Credit Suisse VPP letter 772014

(b)(5)

Let me know if you disagree.

Thanks,
Ajay

From: Charley, Willie
Sent: Friday, July 18, 2014 2:51 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: AO - SCREENING - DSIO - Credit Suisse VPP letter 772014

Mark/Ajay,

Today, July 18, 2014 – DSIO has requested the attached document be processed through absent objection. Please review for recusal/conflict. Please note the requested due date for an official release to Credit Suisse:

Friday, July 25.

Thanks,

Willie

From: Olear, Amanda L
Sent: Friday, July 18, 2014 2:44 PM
To: Inbox – Secretariat
Cc: Stewart, Lawranne
Subject: Credit Suisse VPP letter 772014

Please find attached a no-action letter that DSIO intends to issue to Credit Suisse with respect to their status as a CPO and CTA due to advising a VPP special purpose vehicle. Please place this into absent objection upon Lawranne Stewart's release. The deadline should be set for noon on Friday, July 25.

Please do not hesitate to contact me with any questions or concerns that you might have.

Best,
Amanda Olear
Associate Director
Division of Swap Dealer and Intermediary Oversight
United States Commodity Futures Trading Commission
1155 21st St., N.W.
Washington, D.C. 20581
Telephone: 202-418-5283
email: aolear@cftc.gov

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, July 21, 2014 2:46 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: AO Circulation - DSIO Technical Correction to Rulemaking

Ajay we agree with your analysis (b)(5)

(b)(5)

(b)(5) Thanks.

From: Sutaria, Ajay
Sent: Sunday, July 20, 2014 9:47 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: AO Circulation - DSIO Technical Correction to Rulemaking

(b)(5)

Let me know if you know of any facts that change this analysis, and/or disagree.

Thanks,
Ajay

From: Charley, Willie
Sent: Thursday, July 17, 2014 4:13 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick,

Chris; Charley, Willie
Subject: FW: AO Circulation - DSIO Technical Correction to Rulemaking

Mark/Ajay,

Today, July 17, 2014 – DSIO submitted the attachments to be entered into the seriatim process. Please conduct the recusal/conflict review on behalf of Commissioners Bowen and Giancarlo.

Standing by....and thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Kirkpatrick, Chris
Sent: Thursday, July 17, 2014 3:17 PM
To: Charley, Willie
Subject: RE: AO Circulation - DSIO Technical Correction to Rulemaking

Willie,

Here's the plan for this one – It needs to be circulated as a seriatim, not an absent objection. There is no specific deadline for action on the seriatim. The cover memo (attached) is unchanged from what DSIO sent. The revised version of the correction document that should be circulated in seriatim is also attached. Please let me know if you have any questions. Thank you.

Chris

From: Bretscher, Mark
Sent: Thursday, July 17, 2014 10:30 AM
To: * All Secretariat DC
Cc: Barnett, Gary; Smith, Thomas J.; Bretscher, Mark; Beale, Joshua
Subject: AO Circulation - DSIO Technical Correction to Rulemaking

Secretariat's Office,

Per the instructions of the Chairman's Office, please AO circulate as soon as possible the following Technical Correction:

Technical Correction to rulemaking: Enhancing Protections Afforded Customers and Customer Funds

Held by Futures Commission Merchants and Derivatives Clearing Organizations

Attached is the draft federal register release and memorandum.

The AO deadline should be 4:30pm (Monday, July 21, 2014). The contact in the Chairman's Office is Lawranne Stewart.

Regards,

Mark Bretscher
Special Counsel
Commodity Futures Trading Commission
Division of Swap Dealers and
Intermediary Oversight
(312) 596-0529

From: Gottry, Heather </O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E>
Sent: Thursday, July 17, 2014 1:17 PM
To: Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Dolan, John <jdolan@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE- Request for Seriatim Concurrence - Edwin A. Vasquez

Ajay – We concur with your analysis. Please let us know if we can be of any further assistance. Thnak you.

- Heather

From: Sutaria, Ajay
Sent: Wednesday, July 16, 2014 8:20 PM
To: Marcus, Jonathan L.; Gottry, Heather; Dolan, John
Cc: Goggins, Jason; Blase, Marcia K.
Subject: FW: Seriatim - SCREENING - DOE- Request for Seriatim Concurrence - Edwin A. Vasquez

(b)(5)



Let me know if you disagree.

Thanks,
Ajay

From: Charley, Willie
Sent: Wednesday, July 16, 2014 12:46 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick, Chris; Charley, Willie
Subject: Seriatim - SCREENING - DOE- Request for Seriatim Concurrence - Edwin A. Vasquez

Mark/Ajay,

Today, 7/16/14, the Division of Enforcement submitted the attached document for seriatim. If you would, please review for recusal/conflict.

Thanks so much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Wednesday, July 16, 2014 11:58 AM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Edwin A. Vasquez

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

There were no revisions to this recommendation by OGC.

With respect to conflicts, it is my understanding from staff that:

(b)(5)

CRO Staff points of contact: Rosemary Hollinger/Scott Williamson/Susan Gradman.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission

hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, July 15, 2014 12:59 PM
To: Charley, Willie <WCharley@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Palm Beach Capital LLC

An ethics review has been completed regarding seriatim concurrence (b)(5)

(b)(5)

From: Charley, Willie
Sent: Friday, July 11, 2014 12:03 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Kirkpatrick, Chris; Goggins, Jason; Blase, Marcia K.; Charley, Willie
Subject: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - Palm Beach Capital LLC

Good afternoon,

Friday, 11 July 14 – The Secretariat received the attached documents from DOE to enter into seriatim, re: Palm Beach Capital. If you would be so kind, please screen on behalf of Commissioners Bowen and Giancarlo.

Requested completion date is Thursday, July 24th.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Friday, July 11, 2014 10:58 AM

To: Inbox – Secretariat

Cc: Smith, Yolanda E.; Burr, Andrew

Subject: Request for Seriatim Concurrence - Palm Beach Capital LLC

Please find the attached DOE recommendation submitted for Seriatim Concurrence. **Commission approval by Thursday, July 24th is requested in order to meet a court filing deadline.**

There were no revisions to this recommendation by OGC.

(b)(5)

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6)

(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, July 15, 2014 10:08 AM
To: Charley, Willie <WCharley@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - John Aaron Brooks

An ethics review has been completed regarding seriatim concurrence (b)(5)

(b)(5)



(b)(5)



(b)(5)

From: Charley, Willie
Sent: Friday, July 11, 2014 9:34 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Kirkpatrick, Chris; Goggins, Jason; Blase, Marcia K.; Charley, Willie
Subject: Seriatim - SCREENING - DOE - Request for Seriatim Concurrence - John Aaron Brooks

Good morning,

Friday, 11 July 14 – The Secretariat received the attached documents from DOE to enter into seriatim. If you would be so kind, please screen on behalf of Commissioners Bowen and Giancarlo.

Requested completion date is Thursday, July 24th.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Thursday, July 10, 2014 10:15 PM
To: Inbox – Secretariat
Cc: Kirkpatrick, Chris; Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - John Aaron Brooks

Please find the attached DOE recommendation submitted for Seriatim Concurrence. **Commission approval by Thursday, July 24th is requested in order to meet a court filing deadline.**

There were no revisions to this recommendation by OGC.

With respect to conflicts, It is my understanding from staff that:

(b)(5)



ERO Staff points of contact: Manal Sultan/David Acevedo/Janine Garguilo.

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189
(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Tuesday, July 15, 2014 8:56 AM
To: Charley, Willie <WCharley@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>
Subject: RE: Seriatim - SCREENING - DOE Request for Seriatim Concurrence - Jacob Stein

An ethics review has been completed regarding seriatim concurrence (b)(5)

(b)(5)



From: Charley, Willie
Sent: Thursday, July 10, 2014 10:25 AM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Kirkpatrick, Chris; Goggins, Jason; Blase, Marcia K.; Charley, Willie
Subject: Seriatim - SCREENING - DOE Request for Seriatim Concurrence - Jacob Stein

Good morning,

Today, July 10, 2014 - DOE has submitted a matter to be entered into seriatim. The attached is for screening on behalf of Commissioners Bowen and Giancarlo. A requested due date was not specified.

Thanks much,

Willie

Willie Charley
Assistant Secretary | Executive Secretariat Branch
Office of the Executive Director, U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E
Sent: Thursday, July 10, 2014 10:07 AM
To: Inbox – Secretariat
Cc: Smith, Yolanda E.; Burr, Andrew
Subject: Request for Seriatim Concurrence - Jacob Stein

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

(b)(5)

Harry

Harry E. Wedewer
Attorney, Office of Chief Counsel
Division of Enforcement
United States Commodity Futures Trading Commission
hwedewer@cftc.gov
(202) 418-5189

(b)(6)

(cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Monday, July 14, 2014 2:18 PM
To: Charley, Willie <WCharley@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Subject: RE: SERIATIM - RECUSAL/CONFLIC SCREENING - DOE Request for Seriatim Concurrence - R2 Capital Group LLC et al.

An ethics review has been completed regarding seriatim concurrence (b)(5)

(b)(5)

From: Charley, Willie
Sent: Friday, June 27, 2014 12:52 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Kirkpatrick, Chris; Charley, Willie
Subject: SERIATIM - RECUSAL/CONFLIC SCREENING - DOE Request for Seriatim Concurrence - R2 Capital Group LLC et al.

Mark/Ajay,

Let me first say, I'm looking forward to working with you.

For matters that require screening, please allow me to use the words that are in ALL CAPS in the subject line. I will do the same thing with absent objections. It will help me keep everything in order...thanks much.

Now, I am forwarding the attached proposed Enforcement matter, which has been submitted to the Secretariat for seriatim circulation, for review in your capacities as the designated recusals/conflicts

screeners for Commissioners Bowen and Giancarlo, respectively. This matter has been submitted to the Chairman's Office for authorization to circulate in seriatim, but has not yet been approved for circulation. While that approval is pending, the Secretariat asks that you start the process of reaching a determination as to whether your respective Commissioners need to be recused from participation in this seriatim matter.

Thanks so much,

Willie

Willie Charley

Assistant Secretary | The Secretariat

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Wedewer, Harry E

Sent: Thursday, June 26, 2014 10:15 PM

To: Inbox – Secretariat; Kirkpatrick, Chris

Cc: Smith, Yolanda E.; Burr, Andrew

Subject: DOE Request for Seriatim Concurrence - R2 Capital Group LLC et al.

Please find the attached DOE recommendation submitted for Seriatim Concurrence.

For Chris: I will give you a call tomorrow regarding the highlighted portion of this.

Harry

Harry E. Wedewer

Attorney, Office of Chief Counsel

Division of Enforcement

United States Commodity Futures Trading Commission

hwedewer@cftc.gov

(202) 418-5189

(b)(6) (cell)

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Thursday, July 10, 2014 8:56 AM
To: Charley, Willie <WCharley@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Fajfar, Mark <MFajfar@CFTC.gov>
Subject: RE: SCREENING - DSIO - No-Action Letters for Absent Objection Circulation

An ethics review has been completed (b)(5)

(b)(5)

(b)(5)

(b)(5)

you.

Thank

From: Charley, Willie
Sent: Wednesday, July 09, 2014 1:56 PM
To: Fajfar, Mark; Sutaria, Ajay
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Goggins, Jason; Blase, Marcia K.; Kirkpatrick,

Chris; Charley, Willie

Subject: HOT: SCREENING - DSIO - No-Action Letters for Absent Objection Circulation

Importance: High

Hello,

The Chairman's office has approved circulation of these two absent objections; however, I'm holding pending screening on behalf of Commissions Bowen and Giancarlo. This one is a fast turn that needs to be completed by tomorrow afternoon.

Would you please screen for recusal/conflict so it may be released, hopefully today. Standing by...

V/r,

Willie

From: Fisanich, Frank

Sent: Wednesday, July 09, 2014 1:20 PM

To: Inbox – Secretariat

Cc: Jurgens, Melissa; Kirkpatrick, Chris; Barnett, Gary; Smith, Thomas J.; Piccoli, Kevin; Remmler, Erik F

Subject: No-Action Letters for Absent Objection Circulation

Dear Secretariat,

Please find attached 2 No-Action letters for Absent Objection circulation.

I have attached the no-action request for one letter; the other has no written request.

I have also attached Cover Memos to be included in the Absent Objection circulation.

Finally, I have attached the e-mail approval from the Chairman's office for the circulation.

We need a deadline of COB Thursday, July 10, 2014 (the letters have to be issued by Friday 7/11 because the compliance date is 7/12).

Please let me know if you have any questions. I will forward the 140.98 cover sheets in just a few minutes.

Regards,

Frank N. Fisanich

Chief Counsel | Division of Swap Dealer and Intermediary Oversight
COMMODITY FUTURES TRADING COMMISSION
FFisanich@cftc.gov | +1 202.418.5949

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, July 9, 2014 12:48 PM
To: Charley, Willie <WCharley@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Fajfar, Mark <MFajfar@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>; Stukes, Anne <AStukes@CFTC.gov>; Schwartz, Rob <RSchwartz@CFTC.gov>; Proctor, William N <wproctor@CFTC.gov>
Subject: RE: Seriatim - Subpoena to the Commission in Fintec Group, Inc. v. U.S. Bank, N.A., Case No. 13-cv-8076 (N.D. Ill.)

An ethics review has been completed regarding the seriatim request (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Charley, Willie
Sent: Wednesday, July 09, 2014 10:19 AM
To: Proctor, William N
Cc: Stukes, Anne; Schwartz, Rob; Marcus, Jonathan L.; Dolan, John; Gottry, Heather; Kirkpatrick, Chris; Charley, Willie
Subject: Seriatim - Subpoena to the Commission in Fintec Group, Inc. v. U.S. Bank, N.A., Case No. 13-cv-8076 (N.D. Ill.)
Importance: High

William,

Just to follow-up and give you current status.

The seriatim in the above subject line has been approved for release by the Chairman's office; however, the recusal/conflict process has not been completed as yet.

I have noted your requested completion date of **Friday, July 11th**; given the fact that this has not yet made it into circulation, I don't think the requested due date will be met.

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, July 9, 2014 8:50 AM
To: Charley, Willie <WCharley@CFTC.gov>; Fajfar, Mark <MFajfar@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>
Subject: RE: AO - RECUSAL/COFLICT SCREENING - DCR - ICE Clear Europe - Temporary No-Action Relief (BoE)

Pursuant to an ethics review of the above no-action request by ICE Clear Europe Limited ("ICE Clear Europe"), which is a derivatives clearing organization ("DCO") and has customer property accounts held by the Bank of England ("BoE") relating to futures positions, is required to obtain an acknowledgment letters in the form set forth in Appendix B to CFTC Regulation 1.20 g)(4) and 22.5 for existing customer segregated accounts by July 12, 2014. (b)(5)

(b)(5)

(b)(5) Thank you.

From: Charley, Willie
Sent: Tuesday, July 08, 2014 9:01 AM
To: Fajfar, Mark; Sutaria, Ajay; Goggins, Jason; Blase, Marcia K.
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Kirkpatrick, Chris; Charley, Willie
Subject: AO - RECUSAL/COFLICT SCREENING - DCR - ICE Clear Europe - Temporary No-Action Relief (BoE)

Mark/Ajay,

Please see attached AO from DCR...over to you for recusal/conflict screening.

Requested due date: July 10th @ 12 Noon.

Thanks much,

Willie

Willie Charley

Assistant Secretary | Executive Secretariat Branch

Office of the Executive Director, U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington DC 20581 | Tel: 202-418-5461 | Room 9208

From: Abadi, Parisa

Sent: Monday, July 07, 2014 6:22 PM

To: Inbox – Secretariat

Cc: Radhakrishnan, Ananda; Dietz, Phyllis; Donovan, Eileen A.; Stewart, Lawranne

Subject: For Absent Objection Review - ICE Clear Europe - Temporary No-Action Relief (BoE)

Good afternoon,

Derivatives clearing organizations are required to obtain acknowledgment letters, in the format set forth in Appendix B to Regulation 1.20, for existing customer segregated accounts by July 12, 2014. In this regard, ICE Clear Europe has submitted a request for temporary no-action relief from the Reg. 1.20 compliance deadline. The extension of time would allow for continued discussions between the Division of Clearing and Risk ("Division") and the Bank of England ("BoE") regarding certain modifications to the template acknowledgment letter that ICE Clear Europe and BoE would execute.

Please see the attached incoming request, a transmittal memo addressed to the Commission providing brief background information, a draft no-action letter, and a corresponding 140.90 cover sheet.

Please note, the Division previously submitted for Commission review, a similar no-action letter for LCH.Clearnet Limited granting an extension of the Reg. 1.20 compliance deadline to allow for continued discussions between the Division and BoE. The attached no-action letter is substantively identical to the no-action letter provided in response to LCH.Clearnet Limited's request.

Please provide your comments by noon Thursday, July 10; feel free to contact me with any questions, x6620. Thank you very much.

Regards,

Parisa

From: Dolan, John </O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN>
Sent: Wednesday, July 9, 2014 8:22 AM
To: Charley, Willie <WCharley@CFTC.gov>; Sutaria, Ajay <ASutaria@CFTC.gov>
Cc: Gottry, Heather <HGottry@CFTC.gov>; Marcus, Jonathan L. <JMarcus@CFTC.gov>; Kirkpatrick, Chris <CKirkpatrick@CFTC.gov>; Goggins, Jason <JGoggins@CFTC.gov>; Blase, Marcia K. <mblase@CFTC.gov>; Ogilvie, Clark <COgilvie@CFTC.gov>; Jurgens, Melissa <MJurgens@CFTC.gov>
Subject: RE: SERIATIM RECUSAL/CONFLICT Screening - DMO - Proposed Commission Order Extending DTCC-SWIFT's Designation as LEI Provider

Pursuant to an ethics review of the above seriatim for a proposed Amended and Restated Order, which would extend the designation of the Depository Trust and Clearing Corporation ("DTCC") and Society for Worldwide Interbank Financial Telecommunication ("SWIFT") joint venture ("DTCC-SWIFT") as the provider of legal entity identifiers, or "LEIs," pursuant to the Commission's recordkeeping and swap data reporting rules. DTCC-SWIFT's designation was made by Commission order on July 23, 2012. The designation was made for a period of two years, and expires on July 23, 2014. (b)(5)

(b)(5)

(b)(5)

Thank you.

From: Charley, Willie
Sent: Tuesday, July 08, 2014 5:04 PM
To: Sutaria, Ajay; Fajfar, Mark
Cc: Dolan, John; Gottry, Heather; Marcus, Jonathan L.; Kirkpatrick, Chris; Goggins, Jason; Blase, Marcia K.; Ogilvie, Clark; Charley, Willie
Subject: FW: SERIATIM RECUSAL/CONFLICT Screening - DMO - Proposed Commission Order Extending DTCC-SWIFT's Designation as LEI Provider

Hello,

Please use **this final version** for recusal/conflict screening. Thanks so much.

Willie

From: Flood, Nora

Sent: Tuesday, July 08, 2014 4:13 PM

To: Inbox – Secretariat

Cc: McGonagle, Vincent A.; Rogers, John L.; Van Wagner, David; Bangarbale, Srinivas; Kirkpatrick, Chris

Subject: SERIATIM RECUSAL/CONFLICT Screening - DMO - Proposed Commission Order Extending DTCC-SWIFT's Designation as LEI Provider

Further to my discussions with Chris Kirkpatrick over the past few days, attached is a proposed Commission order, which would extend the designation of DTCC-SWIFT as the provider of legal entity identifiers, or "LEIs," pursuant to the Commission's recordkeeping and swap data reporting rules.

In addition to the proposed order, the following documents are attached for inclusion in the Commission's voting package:

- Commission's initial order designating DTCC-SWIFT, which was issued on July 23, 2012 (the "Order")
- Previous Commission amendment of the Order, which was issued on June 7, 2013 (the "Amendment")
- A memorandum to the Commission, from ODT and DMO, regarding the proposed order
- A redline marking changes between the operative language of the proposed order, and the existing language of the Order as modified by the Amendment

Please let me know if the Secretariat's office has any questions, or requires any additional information in order to prepare a voting package for the proposed order, and to submit the voting package to the Chairman's office for approval to circulate seriatim.

Please note that DTCC-SWIFT's existing designation expires on **Wednesday, July 23, 2014**. While I believe that the Chairman's office is already aware of this, I would be grateful if the Secretariat's office could highlight the July 23rd expiration date when it submits the voting package to the Chairman's office for approval – as it will have a bearing on the timeframe established for Commission review of the proposed order.

Kind regards,

Nora

Nora Flood
Attorney Advisor
Division of Market Oversight
Commodity Futures Trading Commission
1155 21st Street NW
Washington, DC 20581

Phone: (202) 418-5354
E-Mail: nflood@cftc.gov

Tilliman, Tameka

From: LoPresti, Heather
Sent: Thursday, September 29, 2016 9:36 AM
To: Gottry, Heather
Subject: FW: ethics question

(b)(5)



Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: LoPresti, Heather
Sent: Thursday, September 29, 2016 9:32 AM
To: Lowe, Gretchen L.; Berkowitz, Susan A.
Subject: RE: ethics question

Thank you Gretchen,

I know that Heather has been planning to open discussions on this issue with ENF as this issue seems to be arising more frequently. I will let her know.

Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: Lowe, Gretchen L.
Sent: Thursday, September 29, 2016 9:25 AM
To: LoPresti, Heather; Berkowitz, Susan A.
Subject: RE: ethics question

Good morning Heather,

Thank you for the detailed explanation.

(b)(5)

(b)(5)

Many thanks
Gretchen

Gretchen L. Lowe
Principal Deputy Director/Chief Counsel
Division of Enforcement
US Commodity Futures Trading Commission
1155 21st NW
Washington DC 20581
(202) 418-5379
(202) 418-5538 (fax)

From: LoPresti, Heather
Sent: Wednesday, September 28, 2016 3:51 PM
To: Berkowitz, Susan A.
Cc: Lowe, Gretchen L.
Subject: RE: ethics question

Hi Susan,

(b)(5)

(b)(5)

A large rectangular area of the document is completely redacted, indicated by a solid black box.

If you would like to proceed forward, please let me know. I am also available to discuss.

Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: Berkowitz, Susan A.
Sent: Tuesday, September 27, 2016 12:26 PM
To: LoPresti, Heather
Cc: Lowe, Gretchen L.
Subject: RE: ethics question

Heather,

(b)(5)

A rectangular area at the bottom of the email body is redacted with a solid black box.

(b)(5)

Kind regards,

Susan A. Berkowitz
Deputy Chief Counsel
Division of Enforcement
Commodity Futures Trading Commission
525 West Monroe Street
Chicago, Illinois 60661



312.596.0719

sberkowitz@cftc.gov

WARNING: This message is intended only for the use of the addressee and may contain information that is privileged, proprietary in nature, or otherwise protected by law from disclosure. If you are not the addressee, you are notified that reading, copying, or distributing this message is prohibited. If you have received this message in error, please telephone or reply to me immediately and delete all copies of the message from your computer systems.

From: LoPresti, Heather
Sent: Tuesday, September 27, 2016 9:56 AM
To: Berkowitz, Susan A.
Cc: Lowe, Gretchen L.
Subject: RE: ethics question

Hi Susan,

(b)(5)

(b)(5)



Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: Berkowitz, Susan A.
Sent: Tuesday, September 27, 2016 10:12 AM
To: LoPresti, Heather
Cc: Lowe, Gretchen L.
Subject: RE: ethics question

(b)(5)



Kind regards,

Susan A. Berkowitz
Deputy Chief Counsel
Division of Enforcement
Commodity Futures Trading Commission
525 West Monroe Street
Chicago, Illinois 60661



312.596.0719

sberkowitz@cftc.gov

WARNING: This message is intended only for the use of the addressee and may contain information that is privileged, proprietary in nature, or otherwise protected by law from disclosure. If you are not the addressee, you are notified that reading, copying, or distributing this message is prohibited. If you have received this message in error, please telephone or reply to me immediately and delete all copies of the message from your computer systems.

From: LoPresti, Heather
Sent: Tuesday, September 27, 2016 8:54 AM
To: Berkowitz, Susan A.
Cc: Lowe, Gretchen L.
Subject: RE: ethics question

Susan,

(b)(5)

Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: Berkowitz, Susan A.
Sent: Thursday, September 15, 2016 11:35 AM

To: LoPresti, Heather
Cc: Lowe, Gretchen L.
Subject: ethics question

Heather,

As you requested, here are the facts underlying the question about my involvement in a project at the Commission.

(b)(5)



Kind regards,

Susan A. Berkowitz
Deputy Chief Counsel
Division of Enforcement
Commodity Futures Trading Commission
525 West Monroe Street
Chicago, Illinois 60661



312.596.0719

sberkowitz@cftc.gov

WARNING: This message is intended only for the use of the addressee and may contain information that is privileged, proprietary in nature, or otherwise protected by law from disclosure. If you are not the addressee, you are notified that reading, copying, or distributing this message is prohibited. If you have received this message in error, please telephone or reply to me immediately and delete all copies of the message from your computer systems.

Tilliman, Tameka

From: LoPresti, Heather
Sent: Tuesday, June 07, 2016 11:16 AM
To: Principato, Joseph
Cc: Nudge, Gerald J
Subject: RE: Guidance Regarding Your Stocks and Sector Mutual Fund Holdings and Other Ethics Matters

Hi Joe,

You are correct that you currently do not have to divest your bonds (b)(5)

(b)(5)

You also do not have to divest your mutual fund (b)(5)

(b)(5)

Finally, at this moment, you are not required to divest your (b)(5) stock (b)(5)

(b)(5)

(b)(5)

I hope this clarifies, but please let me know if you have any questions. If any issues arise throughout the year, do not hesitate to contact either myself, John Dolan, or Bianca Gomez.

Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: Principato, Joseph
Sent: Tuesday, June 07, 2016 10:06 AM
To: LoPresti, Heather
Cc: Nudge, Gerald J
Subject: RE: Guidance Regarding Your Stocks and Sector Mutual Fund Holdings and Other Ethics Matters

Heather,

Thank you for taking the time to speak to Jerry and I this morning regarding my financial holdings. (b)(5)

(b)(5)

Thank you for your attention to this matter.

Regards,

Joe

Joseph Principato
Audit Manager
Commodity Futures Trading Commission
Division of Swap Dealer and Intermediary Oversight
140 Broadway
New York, N.Y. 10005
(646)746-9837
Email:JPrincipato@CFTC.gov

From: LoPresti, Heather
Sent: Friday, June 03, 2016 3:19 PM
To: Principato, Joseph
Subject: RE: Guidance Regarding Your Stocks and Sector Mutual Fund Holdings and Other Ethics Matters

Hi Joe,

(b)(5)



Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: LoPresti, Heather
Sent: Friday, June 03, 2016 2:42 PM

To: Principato, Joseph

Subject: Guidance Regarding Your Stocks and Sector Mutual Fund Holdings and Other Ethics Matters

Hi Joseph,

CFTC Ethics has reviewed and certified your 2016 Office of Government Ethics (“OGE”) Form 450 covering your financial interests from January 1, 2015, to December 31, 2015. (b)(5)

(b)(5)

(b)(5)



If you would like to discuss this email or have additional questions, please contact John Dolan, x5220, Bianca Gomez, x5627, Heather LoPresti, x5976, or Heather Gottry, x5774.

Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

Tilliman, Tameka

From: Stukes, Anne
Sent: Thursday, July 21, 2016 3:47 PM
To: LoPresti, Heather
Cc: Schwartz, Rob
Subject: FW: Subpoena re Hunter Wise Commodities v Timothy Carey and Winston & Strawn
Attachments: Subpoena Hunter Wise Commodities v Timothy Carey and Winston & Strawn 7 13 16.pdf

Heather,
FYI, I disqualified myself from this subpoena matter

(b)(6)

(b)(6)

Many thanks,
Anne Stukes

Anne W. Stukes
Commodity Futures Trading Commission
Office of General Counsel
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
(202) 418-5127 – Direct Dial
(202) 418-5567 – Fax
astukes@cftc.gov

-----Original Message-----

From: Schwartz, Rob
Sent: Thursday, July 21, 2016 3:16 PM
To: White, Martin B.
Cc: Williams, Patricia P.; Stukes, Anne
Subject: FW: Subpoena re Hunter Wise Commodities v Timothy Carey and Winston & Strawn

Martin,

Thanks for taking this over from Anne.

Rob Schwartz
Deputy General Counsel (Litigation and Adjudication) U.S. Commodity Futures Trading Commission
1155 21st Street, NW | Washington, DC 20581 | O: 202.418.5958 | F: 202.418.5567 | E: rschwartz@cftc.gov

-----Original Message-----

From: Stukes, Anne
Sent: Thursday, July 21, 2016 12:47 PM
To: Schwartz, Rob
Subject: FW: Subpoena re Hunter Wise Commodities v Timothy Carey and Winston & Strawn

Would you have time to talk with me about this today?

-----Original Message-----

From: Schwartz, Rob

Sent: Wednesday, July 13, 2016 3:00 PM

To: Stukes, Anne

Cc: Williams, Patricia P.

Subject: FW: Subpoena re Hunter Wise Commodities v Timothy Carey and Winston & Strawn

Amended

Rob Schwartz

Deputy General Counsel (Litigation and Adjudication) U.S. Commodity Futures Trading Commission

1155 21st Street, NW | Washington, DC 20581 | O: 202.418.5958 | F: 202.418.5567 | E: rschwartz@cftc.gov

-----Original Message-----

From: Allen, Natise L.

Sent: Wednesday, July 13, 2016 2:53 PM

To: Williams, Patricia P.

Cc: Marcus, Jonathan L.; Schwartz, Rob; Kirkpatrick, Chris

Subject: Subpoena re Hunter Wise Commodities v Timothy Carey and Winston & Strawn

Hi Pat,

We received a subpoena in our office via courier this afternoon. I attached a .pdf and will bring the original down to your office.

Best,

Natise

Natise Allen

Office of the Executive Director

U.S. Commodity Futures Trading Commission

1155 21st Street, NW

Washington, DC 20581

(202) 418 5031

Tilliman, Tameka

From: LoPresti, Heather
Sent: Friday, July 07, 2017 12:39 PM
To: Dolan, Kathleen
Subject: RE: Your OGE Form 450 is Certified - Please Complete the CFTC Form 20 for Outside Activity

Hi Kate,

(b)(5)



Please let me know if you would like to discuss further.

Thanks
Heather

OMB Circular A-119:

7. What Is The Policy For Federal Participation In Voluntary Consensus Standards Bodies?

Agencies must consult with voluntary consensus standards bodies, both domestic and international, and must participate with such bodies in the development of voluntary consensus standards when consultation and participation is in the public interest and is compatible with their missions, authorities, priorities, and budget resources.

a. What are the purposes of agency participation?

Agency representatives should participate in voluntary consensus standards activities in order to accomplish the following purposes:

- (1) Eliminate the necessity for development or maintenance of separate Government-unique standards.
- (2) Further such national goals and objectives as increased use of the metric system of measurement; use of environmentally sound and energy efficient materials, products, systems, services, or practices; and improvement of public health and safety.

b. What are the general principles that apply to agency support?

Agency support provided to a voluntary consensus standards activity must be limited to that which clearly furthers agency and departmental missions, authorities, priorities, and is consistent with budget resources. Agency support must not be contingent upon the outcome of the standards activity. Normally, the total amount of federal support should be no greater than that of other participants in that activity, except when it is in the direct and predominant interest of the Government to develop or revise a standard, and its timely development or revision appears unlikely in the absence of such support.

c. What forms of support may my agency provide?

The form of agency support, may include the following:

- (1) Direct financial support; e.g., grants, memberships, and contracts.
- (2) Administrative support; e.g., travel costs, hosting of meetings, and secretarial functions.
- (3) Technical support; e.g., cooperative testing for standards evaluation and participation of agency personnel in the activities of voluntary consensus standards bodies.
- (4) Joint planning with voluntary consensus standards bodies to promote the identification and development of needed standards.
- (5) Participation of agency personnel.

d. Must agency participants be authorized?

Agency employees who, at Government expense, participate in standards activities of voluntary consensus standards bodies on behalf of the agency must do so as specifically authorized agency representatives. Agency support for, and participation by agency personnel in, voluntary consensus standards bodies must be in compliance with applicable laws and regulations. For example, agency support is subject to legal and budgetary authority and availability of funds. Similarly, participation by agency employees (whether or not on behalf of the agency) in the activities of voluntary consensus standards bodies is subject to the laws and regulations that apply to participation by federal employees in the activities of outside organizations. While we anticipate that participation in a committee that is developing a standard would generally not raise significant issues, participation as an officer, director, or trustee of an organization would raise more significant issues. An agency should involve its agency ethics officer, as appropriate, before authorizing support for or participation in a voluntary consensus standards body.

e. Does agency participation indicate endorsement of any decisions reached by voluntary consensus standards bodies?

Agency participation in voluntary consensus standards bodies does not necessarily connote agency agreement with, or endorsement of, decisions reached by such organizations.

f. Do agency representatives participate equally with other members?

Agency representatives serving as members of voluntary consensus standards bodies should participate actively and on an equal basis with other members, consistent with the procedures of those bodies, particularly in matters such as establishing priorities, developing procedures for preparing, reviewing, and approving standards, and developing or adopting new standards. Active participation includes full involvement in discussions and technical debates, registering of opinions and, if selected, serving as chairpersons or in other official capacities. Agency representatives may vote, in accordance with the procedures of the voluntary consensus standards body, at each stage of the standards development process unless prohibited from doing so by law or their agencies.

g. Are there any limitations on participation by agency representatives?

In order to maintain the independence of voluntary consensus standards bodies, agency representatives must refrain from involvement in the internal management of such organizations (e.g., selection of salaried officers and employees, establishment of staff salaries, and administrative policies). Agency representatives must not dominate such bodies, and in any case are bound by voluntary consensus standards bodies' rules and procedures, including those regarding domination of proceedings by any individual. Regardless, such agency employees must

avoid the practice or the appearance of undue influence relating to their agency representation and activities in voluntary consensus standards bodies.

h. Are there any limits on the number of federal participants in voluntary consensus standards bodies?

The number of individual agency participants in a given voluntary standards activity should be kept to the minimum required for effective representation of the various program, technical, or other concerns of federal agencies.

i. Is there anything else agency representatives should know?

This Circular does not provide guidance concerning the internal operating procedures that may be applicable to voluntary consensus standards bodies because of their relationships to agencies under this Circular. Agencies should, however, carefully consider what laws or rules may apply in a particular instance because of these relationships. For example, these relationships may involve the Federal Advisory Committee Act, as amended (5 U.S.C. App. I), or a provision of an authorizing statute for a particular agency.

Thanks
Heather

Heather Joy LoPresti
Counsel, Deputy Ethics Counselor
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

From: Dolan, Kathleen
Sent: Wednesday, June 28, 2017 3:49 PM
To: LoPresti, Heather
Subject: RE: Your OGE Form 450 is Certified - Please Complete the CFTC Form 20 for Outside Activity

Hi,

I would like to discuss my Form 20 with you. I have a few questions. Would you have time late tomorrow or Friday to meet with me?

Thanks,

Kate

Kathleen A. (Kate) Dolan, AStd

From: LoPresti, Heather

Sent: Friday, June 23, 2017 4:36 PM

To: Dolan, Kathleen

Subject: Your OGE Form 450 is Certified - Please Complete the CFTC Form 20 for Outside Activity

Hi Kathleen,

CFTC Ethics has reviewed and certified your 2017 Office of Government Ethics ("OGE") Form 450 covering your financial interests from January 1, 2016, to December 31, 2016. Should you decide to buy or sell stocks or mutual funds throughout the year, please remember to check [NFA BASIC](#) to ensure that they are not prohibited interests for CFTC employees. For more information about conflicts of interest and prohibited interests for CFTC employees, please visit the CFTCnet Ethics Program site under [Ethics News](#).

(b)(5)



(b)(5)



If you would like to discuss this email or have additional question contact me, John Dolan, x5220, or Bianca Gomez, x5627.

Thanks
Heather

Heather Joy LoPresti
Counsel, Deputy Ethics Counselor
Commodity Futures Trading Commission
Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

Tilliman, Tameka

From: Blase, Marcia K.
Sent: Wednesday, July 27, 2016 2:20 PM
To: LoPresti, Heather
Subject: Re: Appearance Issues Related to Cyber Security Firm Introductions

Thanks Heather.

----- Original Message -----

From: "LoPresti, Heather" <HLoPresti@CFTC.gov>
Date: Wed, July 27, 2016 1:59 PM -0400
To: "Blase, Marcia K." <mblase@CFTC.gov>
CC: "Roberson, William" <WRoberson@CFTC.gov>
Subject: Appearance Issues Related to Cyber Security Firm Introductions

Hi Marcia,

(b)(5)



Please contact me if you have any questions.

Thanks
Heather

Heather Joy LoPresti
Counsel, Agency Ethics Official

Commodity Futures Trading Commission

Phone: (202) 418-5976

The contents of this electronic transmission are privileged and contain information which may be confidential, or protected by the attorney-client and/or the attorney work product privilege. If you are not the intended recipient, any disclosure, copying, distribution, or use of this information by any means is unauthorized and prohibited. If you have received this communication in error, please notify me immediately and delete the original message and attached materials.

LoPresti, Heather

From: Schroeder, Helene D.
Sent: Tuesday, August 09, 2016 11:47 AM
To: Barbara Wierzynski (b)(6) Allison Lurton (b)(6)
Cc: Beth Thompson (Legal) (b)(6) Chapin, Andrew; Fisanich, Frank; Flaherty, Eileen; LoPresti, Heather; Lee, Scott
Subject: (b)(6)

Hi Allison and Barbara!

I am writing to let you know (unfortunately) that, due to certain financial interests held by (b)(6) I am unable to continue working on (b)(6)

(b)(6)
(b)(6) Because of this financial interest, I have been advised to recuse myself from this matter. Fortunately, we have a great attorney on staff, Scott Lee, who has taken over the task of handling your request, and he is already up to speed.

Fyi, I'm copying Scott on this e-mail so you have his e-mail address for future contact. Scott's direct telephone number is 202-418-5090. Going forward, please reach out to him and do not e-mail or telephone me to discuss this matter.

I enjoyed working with you both on this matter and will follow the progress made, albeit from the outside.

Best regards-

Helene

From: [Banaei, Salman](#)
To: [Dolan, John](#)
Subject: Recusals
Date: Thursday, August 15, 2013 5:04:29 PM

John,

I'm recused from the (b)(6) matter and any "particular matter" (e.g., enforcement action) involving (b)(6)

Salman

From: [McCall, W. Graham](#)
To: [Dolan, John](#)
Subject: recusal
Date: Tuesday, May 21, 2013 4:00:21 PM

John –

Yesterday, I accepted an offer of employment from (b)(6)

(b)(6)

(b)(6) Therefore, through my last date of employment with the Commission, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on

(b)(6)

financial interests, unless I first obtain a written waiver or an authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Regards,
Graham

W. Graham McCall

Attorney-Advisor

Office of Chief Counsel, Division of Market Oversight

U.S. Commodity Futures Trading Commission

1155 21st Street NW, Washington, DC 20581

(202) 418.6150

gmccall@cftc.gov

From: [Hosseini, Ali](#)
To: [Dolan, John](#)
Subject: RE: Recusal
Date: Tuesday, November 12, 2013 5:03:11 PM

Hi John, as an update to the below, I continue to recuse myself from any matters involving (b)(6)
(b)(6) In addition, I will not get involved in any other developing matters, in anticipation of a transition out of the Commission.

Thanks,
Ali

From: Dolan, John
Sent: Thursday, November 07, 2013 12:58 PM
To: Hosseini, Ali
Subject: RE: Recusal

Thank you

From: Hosseini, Ali
Sent: Thursday, November 07, 2013 12:57 PM
To: Dolan, John
Subject: Recusal

Hi John, this is to confirm in writing that I have recused myself orally from any matters involving (b)(6)
(b)(6) since entering into negotiations with it regarding potential opportunities. I will continue to do so until further notice.

Please don't hesitate to provide any further guidance in this regard.

Thanks,
Ali

From: [Juzenas, Eric](#)
To: [Dolan, John](#)
Subject: Recusals
Date: Wednesday, June 19, 2013 2:33:16 PM

John,

When you get a chance, can you give me a buzz? (b)(6)

(b)(6) and just want to discuss the recusal process. Thanks!

-eric.

From: [McCracken, Kenneth](#)
To: [Dolan, John](#)
Cc: (b)(6)
Subject: RE: Current Recusals Record
Date: Tuesday, December 24, 2013 10:36:14 AM

Updated - My own record, copied to you.

Current Recusal dates:

10/18/13	(b)(6)
10/22/13	(b)(6)
10/22/13	(b)(6)
10/29/13	(b)(6)
11/5/13	(b)(6)
11/22/13	(b)(6)

Interview Dates:

11/15/13	(b)(6)
11/8/13	(b)(6)
11/12/13	(b)(6)
11/7/13; 12/20/13	(b)(6)
11/11/13	(b)(6)

Firms where no further discussions will occur:

(b)(6)	as of 11/18/13
(b)(6)	as of 11/22/13
(b)(6)	as of 11/25/13

From: McCracken, Kenneth
Sent: Monday, November 25, 2013 2:11 PM
To: [Dolan, John](#)
Cc: (b)(6)
Subject: RE: Current recusals Record

Firms where no further discussions will occur:

(b)(6)	as of 11/25/13
--------	----------------

From: McCracken, Kenneth
Sent: Friday, November 22, 2013 2:20 PM
To: [Dolan, John](#)
Cc: (b)(6)
Subject: Current recusals Record

My own record, copied to you.

Current Recusal dates:

10/18/13 (b)(6)
10/22/13
10/22/13
10/29/13
11/5/13
11/22/13

Interview Dates:

11/15/13 (b)(6)
11/8/13
11/12/13
11/7/13
11/11/13

Firms where no further discussions will occur:

(b)(6) as of 11/18/13
(b)(6) as of 11/22/13

Kenneth W. McCracken

Chief Trial Attorney

U.S. Commodity Futures Trading Commission

Three Lafayette Centre

1155 21st Street, NW

Washington, DC 20581

Telephone: (202) 418-5348

Facsimile: (202) 418-5531

kmccracken@cftc.gov



From: [Pease, Robert](#)
To: [McGonagle, Vincent A.](#); [Dolan, John](#)
Subject: recusal
Date: Tuesday, June 04, 2013 2:31:50 PM

I will be leaving the agency at the end of (b)(6) and going to work at (b)(6) so I understand that I'm recused unless I first obtain a written waiver or an authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2). Thanks.

From: [Shafer, Jason](#)
To: [Dolan, John](#)
Subject: Notice of Recusal
Date: Friday, October 25, 2013 3:18:08 PM

John,

I am recusing myself from all matter involving (b)(6) until further notice. Thanks.

Jason A. Shafer

Special Counsel | Division of Swap Dealer and Intermediary Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre | 1155 21st Street, NW | Washington, D.C. 20581
(202) 418-5097

WARNING: This message is intended only for the use of the addressee and may contain information which is privileged, proprietary in nature, or otherwise protected by law from disclosure. If you are not the addressee, you are notified that reading, copying or distributing this message is prohibited. If you have received this message in error, please telephone or reply to me immediately and delete all copies of the message from your computer systems.

From: [Zaidi, Amir](#)
To: [Dolan, John](#)
Subject: Recusal
Date: Thursday, June 20, 2013 5:21:12 PM

John,

For as long as I am discussing employment opportunities with, or negotiating for or have an agreement of employment or compensation with (b)(6) I will not participate personally and substantially in any particular matter that has a direct and predictable effect on (b)(6) financial interests, unless I first obtain a written waiver or an authorization consistent with 5 C.F.R. § 2635.605, or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

Thanks,
Amir

MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: Timothy Massad *TGM*
Chairman
Commodity Futures Trading Commission

SUBJECT: Ensuring Compliance with Ethics Commitments

DATE: August 12, 2014

This memorandum sets forth the screening procedures that I have established to ensure compliance with the terms of my Ethics Agreement, dated November 20, 2013, which I executed prior to my appointment as Chairman and Commissioner of the Commodity Futures Trading Commission.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or that could cause a reasonable person to question my impartiality.

Pursuant to the terms of the (b)(6) partnership agreement, upon withdrawing from the firm, I am entitled to receive and do receive payments in respect of my prior service. Until I have received all of these payments, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of (b)(6) to make these payments to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, until I have received all of these payments, I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I retain a vested beneficial interest in the holdings of the (b)(6)

(b)(6)

(b)(6) I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of either trust, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which the (b)(6) (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R § 2635.502(d).

Each of the (b)(6) holds a minority partnership interest in a partnership created by (b)(6) that in turn directly owns (b)(6) I do not directly hold any interest in (b)(6) I have received a limited waiver pursuant 18 U.S.C. § 208(b)(1) that allows me to participate in particular matters of general applicability such as rulemakings, legislation, and policy affecting my financial interests in (b)(6) I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) (b)(6) is a party or represents a party.

I will retain my position as (b)(6)

(b)(6)

I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of any of the trusts, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

In order to help ensure that I do not participate in matters relating to any of the entities listed above, I have taken or will take the following steps:

1. I have instructed (b)(6) (b)(6) and (b)(6) to screen all matters directed to my attention that involve outside entities or that require my participation to determine if they involve any of the entities or organizations listed above.

2. I will provide (b)(6) and (b)(6) with a copy of this memorandum, my most recent OGE Form 278, and ethics agreement so that they may fully understand the purpose and scope of my recusal obligations and this screening arrangement. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing (b)(6) (b)(6) and (b)(6) to seek the assistance of an agency ethics official if they are ever uncertain whether or not I may participate in a matter.

3. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments

involving my recusal obligations should be directed to (b)(6) and (b)(6), without my knowledge or involvement.

4. In consultation with an agency ethics official, I will revise and update my ethics agreement and/or this memorandum whenever that is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties.

5. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and (b)(6) and my principal subordinates.

Cc: Commissioner Wetjen
Commissioner Bowen
Commissioner Giancarlo
Executive Director
Director of Enforcement
Director of DSIO
Director of DMO
Director of DCR
Director of OIA
Secretary to the Commission

May 3, 2017

Mr. Daniel Davis, Esq.
General Counsel and Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Davis:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Chairman and Commissioner for the Commodity Futures Trading Commission ("CFTC").

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I retain a vested beneficial interest in the (b)(6)
(b)(6)
(b)(6) I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the (b)(6) unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). For a period of one year after my resignation as executor of the (b)(6)
(b)(6) I will not participate personally and substantially in any particular matter involving specific parties in which the (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I also retain a vested beneficial interest in the holdings of the (b)(6)
including vested beneficial interests in (b)(6)
(b)(6)
(b)(6) I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the (b)(6)

unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). For a period of one year after my resignation as (b)(6)

(b)(6) I will not participate personally and substantially in any particular matter involving specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

(b)(6) For a period of one year after my resignation as (b)(6) I will not participate personally and substantially in any particular matter involving specific parties in which the (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I understand that, if I am confirmed as Chairman and Commissioner of the CFTC, I must comply with the requirements of 7 U.S.C. § 2(a)(8), 7 U.S.C. § 13(c), 7 U.S.C. § 13(d), and the CFTC's supplemental ethics regulations.

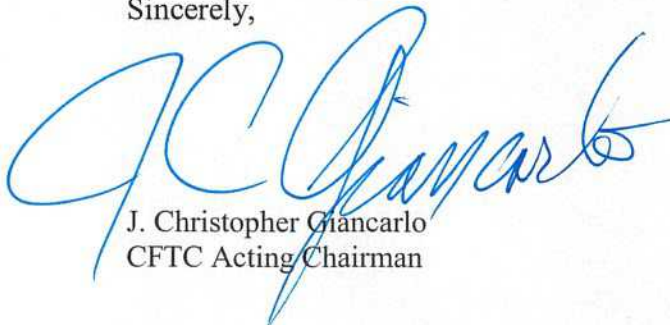
If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet in person with you during the first week of my service in the position of Chairman in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order no. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

Finally, I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.


Sincerely,



J. Christopher Giancarlo
CFTC Acting Chairman

MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: J. Christopher Giancarlo 
Commissioner
Commodity Futures Trading Commission

SUBJECT: Ensuring Compliance with Ethics Commitments

DATE: April 2, 2015

This memorandum sets forth the screening procedures that I have established to ensure compliance with the terms of my Ethics Agreement, dated August 12, 2013, which I executed prior to my appointment as a Commissioner of the Commodity Futures Trading Commission. This memorandum updates my earlier memorandum, dated September 29, 2014.

General Recusals

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or that could cause a reasonable person to question my impartiality.

As required by 5 C.F.R. § 2635.502, I will not participate personally and substantially in any particular matter involving specific parties in which any individual or entity with whom I have a covered relationship, including but not limited to the entities noted in my Ethics Agreement, dated August 12, 2013, is a party or represents a party unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d). Please see Attachment A for the entities covered by this restriction.

As required by paragraph 2 of the Ethics Pledge, I will not participate in any particular matter involving specific parties that is directly and substantially related to my former employers or former clients as defined in the Ethics Pledge for a period of two years

from June 16, 2014, the date of my appointment. I understand that this recusal obligation includes meetings and conversations with my former employers and clients, unless the meeting or conversation is about a particular matter of general applicability and participation in the meeting or conversation is open to all interested parties. Please see Attachment B for the entities covered by this restriction.

(b)(6)

I have divested all of my and my children's financial interests in (b)(6) within the 90 days required by my ethics agreement dated August 12, 2013, and Office of Government Ethics regulations.

On (b)(6) I resigned from my position with (b)(6)

(b)(6)

(b)(6) For a period of two years (b)(6) I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) or any of its wholly owned subsidiaries is a party, or represents a party, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.503(c). Please see Attachment C for a listing of (b)(6) wholly owned subsidiaries.

On February 27, 2015, (b)(6) a global brokerage company servicing the financial and real estate markets, and (b)(6) announced the successful completion of (b)(6) tender offer for (b)(6) shares. As of the expiration of the tender offer at 5:00 PM on February 26, 2015, approximately 54.6 million shares were tendered pursuant to the offer. The 54.6 million tendered shares, together with the 17.1 million shares of (b)(6) common stock already owned by (b)(6) represent approximately 56.3% of (b)(6) outstanding shares. (b)(6) publically announced that all outstanding conditions of the tender offer have been met. As a result of (b)(6) (b)(6) successful tender offer, (b)(6) is now a controlled company of (b)(6) and will operate as a division of (b)(6) with its financial results consolidated as part of (b)(6). As a result, I am going to apply 5 C.F.R. § 2635.502 to (b)(6) (b)(6) and any of its wholly owned subsidiaries. I will treat those entities as organizations with whom I have a covered relationship under 5 C.F.R. § 2635.502. Additionally, I am going to apply the restrictions in paragraph 2 of the Ethics Pledge to (b)(6) and any of its wholly owned subsidiaries. Please see Attachment D for a listing of the wholly owned subsidiaries of (b)(6).

Additionally, I am going to apply 5 C.F.R. § 2635.502 to any entity or individual engaged in the acquisition of a wholly owned subsidiary of either (b)(6) for the duration of the acquisition process. During that time frame, I will treat those entities as organizations with whom I have a covered relationship under 5 C.F.R. § 2635.502.

Other Positions

On (b)(6) I resigned from my position with (b)(6)

On (b)(6) I resigned from my position with the (b)(6)

(b)(6)

I have also resigned from my positions with the (b)(6)

(b)(6)

Compliance Review and Screening

In order to ensure compliance with my ethics obligations I have taken or will take the following steps:

1. I have instructed (b)(6) to screen all matters directed to my attention that involve outside entities to determine whether my participation is appropriate.
2. I will provide (b)(6) with a copy of this memorandum, a copy of my memorandum, dated September 29, 2014, my most recent OGE Form 278 and any subsequently filed transaction reports, and my August 12, 2013 ethics agreement so that (b)(6) may fully understand the purpose and scope of my recusal obligations and this screening arrangement. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing (b)(6) to seek the assistance of an agency ethics official if (b)(6) is ever uncertain whether or not I may participate in a matter.
3. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to (b)(6) without my knowledge or involvement.
4. In consultation with an agency ethics official, I will revise and update this memorandum whenever it is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties. I have instructed (b)(6) to monitor and update Attachments A-D as appropriate and to share any updates or changes with agency ethics officials as well as the individuals copied below.
5. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and my principal subordinates.

**Cc: Chairman Massad
Commissioner Wetjen
Commissioner Bowen
Executive Director
Director of Enforcement
Director of DSIO
Director of DMO
Director of DCR
Secretary to the Commission**

April 4, 2017

Mr. Daniel Davis, Esq.
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Davis:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

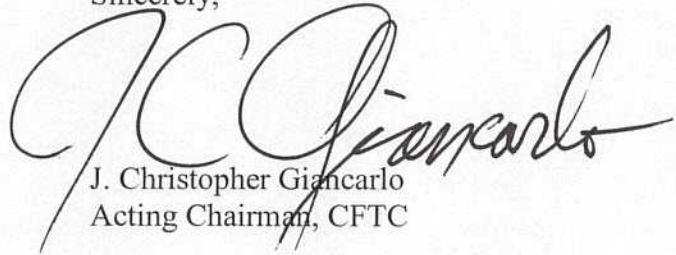
I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interest: (b)(6)
(b)(6). I acquired this interest subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or passive acquisition of prohibited financial interests apply to me. See 17 C.F.R. Part 140.735-2a(d). As such, I have decided to divest this interest and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest until this prohibited interest is divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Christopher Giancarlo". The signature is fluid and cursive, with a large initial "J" and "C".

J. Christopher Giancarlo
Acting Chairman, CFTC



U.S. COMMODITY FUTURES TRADING COMMISSION

Three Lafayette Centre
1155 21st Street, NW, Washington, DC 20581
www.cftc.gov

**Office of the
General Counsel**

MEMORANDUM

INTERNAL MEMO

TO: (b)(6) Mr. Paul Hayeck, Mr. John Einstman, Division of Enforcement (Washington, D.C.)

FROM: Heather Gottry, Deputy General Counsel for General Law & Alternate Designated Agency Ethics Official
Heather LoPresti, Ethics Counselor

DATE: September 27, 2016

SUBJECT: Limited authorization until March 31, 2017 for (b)(6) participation in certain matters related to an ongoing investigation of (b)(5)

I. INTRODUCTION

The purpose of this memorandum is to provide a limited authorization until March 31, 2017 pursuant to 5 C.F.R. § 2635.502(d), to (b)(6) of the Division of Enforcement ("ENF") to participate in certain matters related to an ongoing

(b)(5)

II. FACTUAL BACKGROUND

(b)(6) is currently an ENF trial attorney in CFTC's Washington D.C. office. (b)(6) had been assigned to participate in an ENF investigation where (b)(6) is employed by a law firm that was hired by the subject of the investigation to represent former employees.

(b)(6)

(b)(6)

There are currently four CFTC attorneys, Mr. John Einstman, Mr. Jonah McCarthy, Mr. Dan Grimm, and (b)(6) in ENF conducting various aspects of an investigation against (b)(5)

(b)(5)

(b)(5) As of (b)(6) had worked 1,320.25 hours on this matter. (b)(6) has personally reviewed 60% of the documents that the team has reviewed in this matter. Once (b)(6) tags a document as reviewed, the other attorneys on the team are likely to review only a subset of the documents that (b)(6) has tagged. Additionally, (b)(6) has spent many hours working with a technical expert hired to assist in this case. (b)(6) has taken investigative testimony from five of seventeen witnesses, has personally created substantial and critical work product that is routinely used by the ENF team, and is generally recognized as the team's in-house expert on the exceptionally complicated aspects of (b)(5)

(b)(5)

(b)(6) and its current employees are represented by (b)(6) Chicago law office. However, ENF learned in October 2015 that (b)(6) hired (b)(6) Chicago law office, specifically the litigation group, to represent six former (b)(6) employees subpoenaed by ENF. Thus far, seventeen witnesses have given testimony in this matter, including five former (b)(6) employees represented by (b)(6). Further, (b)(6) is only one of several law firms that represent a handful of former (b)(6) employees who have been identified as witnesses in this investigation.

(b)(6) is a (b)(6) in (b)(6) Washington DC office. (b)(6) is a member of the (b)(6) and does not routinely work with (b)(6) Chicago office litigation group. According to its website and public sources, (b)(6) has over 1,900 attorneys in 20 offices located in 15 countries and is the (b)(6) law firm in the United States. As an (b)(6) (b)(6) does not share in any profit of the firm through bonuses compensation or otherwise. According to an e-mail from (b)(6) dated July 11, 2016, (b)(6) (b)(6) Washington DC office has a (b)(5)

(b)(5)

year.¹ According to Mr. Hayeck in his e-mail to CFTC Ethics dated August 30, 2016,
(b)(6) advised him that (b)(6) (b)(5)

(b)(5)

(b)(6) immediate supervisor is Mr. John Einstman, Chief Trial Attorney and (b)(6)
second-level supervisor is Mr. Paul Hayeck, Deputy Director. Mr. Einstman is the
responsible attorney assigned to the matter, and Mr. Hayeck is responsible for
virtually all critical strategic decisions on the case with input from Mr. Einstman, (b)(6)
(b)(6), and the other members of the ENF team assigned to this investigation.

In a meeting on September 12, 2016, Mr. Hayeck and Mr. Einstman advised the
ADAEO that ENF has two vacant full-time equivalent positions, and that two senior
attorneys with significant case load and experience left the agency last week, and that

(b)(5)

III. LEGAL ANALYSIS

(b)(5)

¹ (b)(6) July 11, 2016 e-mail to CFTC Ethics cites the following blog article to supplement (b) explanation of
(b)(6)

(b)(6)

Limited Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 4

(b)(5)



(b)(5)

The General Counsel as Designated Agency Ethics Official (DAEO) or an Alternate DAEO (ADAEO) “may authorize the employee to participate in the matter based on a determination, made in light of all relevant circumstances, that the interest of the government in the employee's participation outweighs the concern that a reasonable person may question the integrity of the agency's programs and operations.” *See* 5 C.F.R. Part 2635.502(d). As set forth in 5 C.F.R. Part 2635.502(d)(1)-(6), the factors to be considered by the DAEO or ADAEO includes:

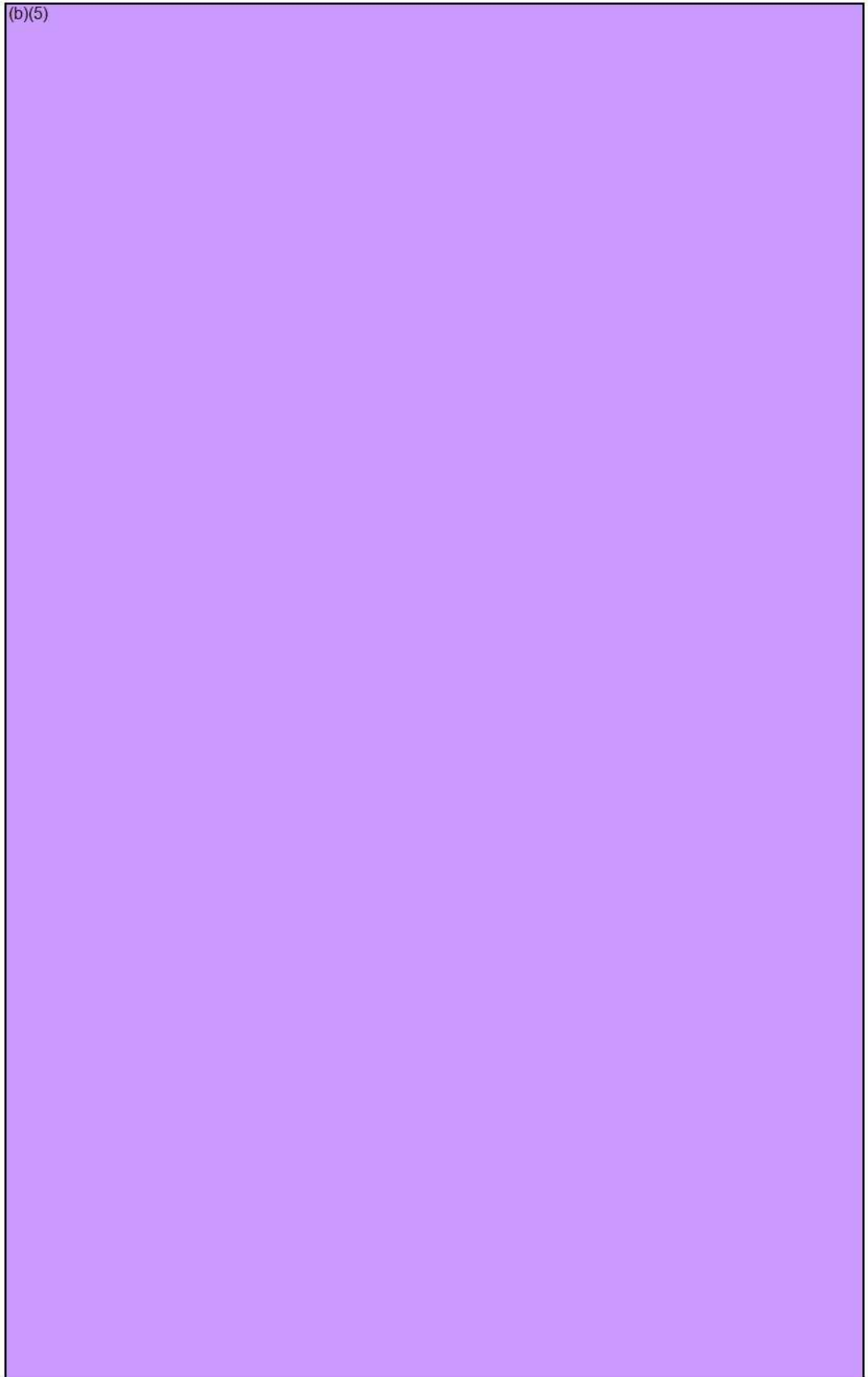
- (1) The nature of the relationship involved;
- (2) The effect that resolution of the matter would have upon the financial interests of the person involved in the relationship;
- (3) The nature and importance of the employee's role in the matter, including the extent to which the employee is called upon to exercise discretion in the matter;
- (4) The sensitivity of the matter;
- (5) The difficulty of reassigning the matter to another employee; and
- (6) Adjustments that may be made in the employee's duties that would reduce or eliminate the likelihood that a reasonable person would question the employee's impartiality.

IV. AUTHORIZATION

Based on the facts provided and as discussed above, I find there is no actual financial conflict of interest under 18 U.S.C. § 208 if (b)(6) participates in this particular matter. (b)(5)

(b)(5)

Limited Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 6



(b)(5)

Limited Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 7

(b)(5)

Based on the above, I have determined, in light of all relevant facts and
circumstances, that the interest of the Commission in (b)(5)

(b)(5)


(b)(5) it is appropriate to issue (b)(6)

this written limited authorization until March 31, 2017, pursuant to 5 C.F.R. Part
502(d).

(b)(5)

Limited Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 8

Should you have any questions regarding this matter or the scope of this limited authorization, please contact me or CFTC Ethics for further guidance.


Heather C. Gottry
Deputy General Counsel & ADAEO

9-27-16
Date



U.S. COMMODITY FUTURES TRADING COMMISSION

Three Lafayette Centre
1155 21st Street, NW, Washington, DC 20581
www.cftc.gov

**Office of the
General Counsel**

MEMORANDUM

INTERNAL MEMO

TO: Jeffrey Bandman, Acting Director, Tad Polley, Associate Director, and
(b)(6) Division of Clearing and Risk

THROUGH: Heather Gottry, Deputy General Counsel, Alternate DAEO, and
Heather LoPresti, Ethics Counselor

FROM: Jonathan L. Marcus, General Counsel and Designated Agency Ethics
Official (DAEO)

DATE: October 5, 2015

SUBJECT: Limited Authorization to Approve the Limited Participation of (b)(6)
(b)(6) Related
Matters

I. INTRODUCTION

The purpose of this memorandum is to provide a limited authorization pursuant to 5 C.F.R. § 2635.502(d), to (b)(6) Division of Clearing and Risk in Chicago ("DCR"), to participate in particular matters related to (b)(6) (b)(6) subject to the below restrictions.

II. FACTUAL BACKGROUND

(b)(6) was (b)(6) by DCR with the intention that (b)(6) would be assigned to participate with (b)(6) (b)(6) on particular matters related to (b)(6) (b)(6). It is DCR's intention to have (b)(6) and share (b)(6) experience regarding DCR's policies and processes for (b)(6) thus facilitating a smooth transition of a major DCR responsibility upon (b)(6)

Limited Authorization to Approve the Limited Participation
of (b)(6)
Related Matters Page 2

However, prior to joining the CFTC (b)(6) was an attorney at (b)(6) (b)(6) and served as outside counsel to (b)(6) within the last year before becoming a CFTC employee. (b)(6) last interaction with (b)(6) while at (b)(6) was in January 2015. Pursuant to 5 C.F.R. §2635.502(b)(1)(iv), “an employee has a covered relationship with: . . . any person for whom the employee has, within the last year, served as officer, director, trustee, general partner, agent, attorney, consultant, contractor, or employee.” (b)(6) may not participate in any particular matter involving specific parties with any persons with whom (b)(6) has a covered relationship, whether that person is the specific party involved or representing another before the agency. As such, (b)(6) is currently disqualified from participating in DCR matters affecting (b)(6) through the end of January 2016.

By way of background, (b)(6) is the parent company of (b)(6) operates a registered Derivatives Clearing Organization (“DCO”), (b)(6) a division of (b)(6) and is (b)(6) central counterparty clearing services. (b)(6) provides clearing and settlement services for exchange-traded contracts and cleared over-the-counter derivatives transactions. (b)(6) applies risk management standards and applicable CFTC customer protection standards for products it clears.

(b)(6)

Limited Authorization to Approve the Limited Participation
of (b)(6)
Related Matters Page 3

(b)(6)

Limited Authorization to Approve the Limited Participation

of (b)(6)

Related Matters Page 4

(b)(6)

After serious consideration and weighing the risks to DCR programs and operations, pursuant to 5 C.F.R. § 2635.502, DCR requests that the CFTC's DAEO issue an authorization for (b)(6) to participate, in a very limited capacity, in the (b)(6) exam. (b)(5)

(b)(5)

III. LEGAL STANDARD

(b)(5)

Limited Authorization to Approve the Limited Participation
of (b)(6)
Related Matters Page 5

(b)(5)

The DAEO then “may authorize the employee to participate in the matter based on a determination, made in light of all relevant circumstances, that the interest of the government in the employee's participation outweighs the concern that a reasonable person may question the integrity of the agency's programs and operations.” See 5 C.F.R. § 2635.502(d). Factors which may be taken into consideration include:

- (1) The nature of the relationship involved;
- (2) The effect that resolution of the matter would have upon the financial interests of the person involved in the relationship;
- (3) The nature and importance of the employee's role in the matter, including the extent to which the employee is called upon to exercise discretion in the matter;
- (4) The sensitivity of the matter;
- (5) The difficulty of reassigning the matter to another employee; and
- (6) Adjustments that may be made in the employee's duties that would reduce or eliminate the likelihood that a reasonable person would question the employee's impartiality.

IV. AUTHORIZATION

Based on the facts DCR has provided, I find there is no actual financial conflict of interest under 18 U.S.C. § 208 with (b)(6) participating in DCR matters

(b)(5)

(b)(5) As such, issuance of this authorization pursuant to 5 C.F.R. § 2635.502, will not cause (b)(6) to violate 18 U.S.C. § 208.

Limited Authorization to Approve the Limited Participation
of (b)(6)
Related Matters Page 6

(b)(5)



Limited Authorization to Approve the Limited Participation
of (b)(6)
Related Matters Page 7

(b)(5)

Based on the above, I have determined pursuant to the factors set forth in 5 C.F.R.
§ 502(d) and in light of all relevant facts and circumstances, that the interest of the
Commission in (b)(5)

(b)(5)

(b)(5) and that it is appropriate to issue (b)(6) this written authorization,
subject to the limitations discussed herein.

Limited Authorization to Approve the Limited Participation

of (b)(6)

Related Matters Page 8

Accordingly, I authorize (b)(6) to participate in (b)(6) official capacity (b)(5)

(b)(5)


(b)(5)

This

authorization is strictly limited to accommodate (b)(6) training needs (b)(5)

(b)(5)

Should you have any questions regarding this matter, please contact me or CFTC Ethics.


Jonathan L. Marcus
General Counsel and DAEO

10/5/2015
Date



U.S. COMMODITY FUTURES TRADING COMMISSION

Three Lafayette Centre
1155 21st Street, NW, Washington, DC 20581
www.cftc.gov

**Office of the
General Counsel**

PRIVILEGED & CONFIDENTIAL
MEMORANDUM

TO: (b)(6) Division of Enforcement

CC: David MacGregor, Chief Trial Attorney, Division of Enforcement

THROUGH: Heather Gottry, Deputy General Counsel, Alternate DAEO,
Bianca Gomez, Counsel
John Dolan, Counsel

FROM: Jonathan L. Marcus, General Counsel and Designated Agency Ethics
Official (DAEO)

DATE: August 18, 2016

SUBJECT: Authorization of (b)(6) participation in the investigation of a
matter involving (b)(5)
(b)(5)

I. INTRODUCTION

The purpose of this memorandum is to provide authorization pursuant to 5 C.F.R. Part 2635.502(d), to (b)(6) of the Division of Enforcement ("DOE"), to participate in the investigation of a matter regarding (b)(5)

(b)(5)

II. FACTUAL BACKGROUND

(b)(6) is currently a DOE trial attorney in CFTC's New York office. (b)(6)
(b)(6) is assigned to participate in a DOE investigation where (b)(6) recently learned that
(b)(6) is representing a potential respondent to this

Privileged & Confidential

Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 2

enforcement investigation. (b)(6) is currently (b)(6).
However, (b)(6) works in a different practice area, so (b)(6) would not be
involved in the firm's participation in any CFTC matters.

(b)(6) is also currently assigned to a DOE inquiry investigating (b)(5).
(b)(5) (b)(6) is representing one of the swap dealers,
(b)(6), in private litigation related to this matter. (b)(6) is participating in the
investigation, but is isolated from any portion of the investigation that relates specifically to
(b)(6).

(b)(6)

III. LEGAL STANDARD

(b)(5)

Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 3

(b)(5)

(b)(5)

(b)(5) the CFTC's DAEO "may authorize the employee to participate in the matter based on a determination, made in light of all relevant circumstances, that the interest of the government in the employee's participation outweighs the concern that a reasonable person may question the integrity of the agency's programs and operations." See 5 C.F.R. Part 2635.502(d). Factors which may be taken into consideration include:

- (1) The nature of the relationship involved;
- (2) The effect that resolution of the matter would have upon the financial interests of the person involved in the relationship;
- (3) The nature and importance of the employee's role in the matter, including the extent to which the employee is called upon to exercise discretion in the matter;
- (4) The sensitivity of the matter;
- (5) The difficulty of reassigning the matter to another employee; and
- (6) Adjustments that may be made in the employee's duties that would reduce or eliminate the likelihood that a reasonable person would question the employee's impartiality. 5 C.F.R. Part 2635.502(d).

IV. AUTHORIZATION

Based on the facts provided above, I find there is no actual financial conflict of interest under 18 U.S.C. § 208 regarding the participation of (b)(6) in the investigation of a

(b)(5)

Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 4

(b)(5)



Privileged & Confidential

Authorization for (b)(6) to
Participate in a DOE Investigation.
Page 5

(b)(5)

Based on the above, I have determined, in light of all relevant facts and circumstances, that it is appropriate to issue (b)(6) this written authorization, pursuant to 5 C.F.R. § 502(d),


(b)(5)

Accordingly, I authorize (b)(6) to participate in (b)(6) official capacity in the investigation of a (b)(5)

(b)(5)

(b)(5)

Should you have any questions regarding this matter, please contact CFTC Ethics.


Jonathan L. Marcus
General Counsel, DAEO

8/18/2016
Date

Privileged & Confidential

MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: (b)(6) DSIO

SUBJECT: Ethics Compliance and Screening Mechanism Commitments

DATE: November 9, 2015

In accordance with the provisions 18 U.S.C. § 208, a criminal statute, and its implementing regulation at 5 C.F.R. § 2640, as well as the Commission's Supplemental Standards of Ethical Conduct, 5 C.F.R. Part 5101.102, and the Commission's Code of Conduct, 17 C.F.R. Part 140.735-2a, I am disqualified from participating personally and substantially as an employee of the Executive Branch of the United States in any particular matter involving specific parties, particular matters affecting nonparties, and particular matters of general applicability that would have a direct and predictable effect on any of my financial interests listed below including their parent organization, all subsidiaries, all affiliates, and joint ventures (current and future):

(b)(6)

I also understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or could cause a reasonable person to question my impartiality.

I understand that a particular matter involving specific parties includes any judicial or other proceeding, application, request for an interpretation or other determination, contract, claim, controversy, investigation, or other particular matter involving a specific party or parties. The term typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties.

I understand that particular matters of general applicability include those particular matters that are focused on the interests of a discrete and identifiable class of persons, but do not involve specific parties, such as certain rulemakings.

I further understand that when my ownership of a security is a disqualifying financial interest, I may participate in any particular matter involving specific parties where the aggregate security holdings in the specific parties do not exceed \$15,000. 5 C.F.R. § 2640.202(a)(2).

In addition, I understand that I may participate in any particular matter involving specific parties in which the disqualifying financial interest arises from my financial interests in one or more entities that are not parties to the matter but that are affected by the matter if the securities are publicly traded, and my aggregate holdings in all affected parties does not exceed \$25,000.

Finally, when my ownership of a security is a disqualifying financial interest, I understand that I may participate in any particular matter of general applicability where the securities are publicly traded, the holding in one such security in the sector does not exceed \$25,000, and for all affected securities in the sector, \$50,000. 5 C.F.R. § 2640.202(a)(2)(c)(i)(A)&(B).

In order to help ensure that I do not participate in matters that would have a direct and predictable effect on any of my financial interests relating to any of the entities listed above, I have taken or will take the following steps:

1. I have instructed (b)(6) to screen all matters directed to my attention that involve outside entities or that require my participation to determine if they involve any of the entities or organizations listed above and whether the matters would have a direct and predictable effect on any of my financial interests.
2. For those matters for which I am recused, (b)(6) will take action or re-assign the particular matter without my involvement or knowledge of the particulars of the matter.
3. I will continue to personally take my calls and screen my e-mail. If a particular matter involving any of the above parties is directed to my attention, I will not take any action, but immediately forward the matter to (b)(6) for action or assignment, without my further involvement or knowledge of the particulars of the matter.
4. I will provide (b)(6) with a copy of this memorandum and my most recent OGE Form 278e, so that (b)(6) may fully understand the purpose and scope of my recusal

obligations and this screening arrangement. It is my understanding that (b)(6) will seek the advice of an agency ethics official if (b)(6) is ever uncertain whether or not I may participate in a particular matter.

5. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement and the requirement to forward all matters directed to my attention to (b)(6) as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to (b)(6) without my involvement or knowledge of the particulars of the matter.
6. In consultation with an agency ethics official, I will revise and update this memorandum whenever that is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties.
7. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and my principal subordinates.

I have requested that the CFTC seek a certificate of divestiture for certain conflicting assets and understand that I am required to divest my (b)(6) (b)(6) securities upon receipt of a certificate of divestiture from the Office of Government Ethics within 90-days. I further understand that once I divest, I must reinvest the proceeds from the sale of the property divested into permitted property as defined in 5 C.F.R. § 2634.1003, during the 60-day period beginning on the date of sale. Upon receipt of the certificate of divestiture and subsequent sale of the prohibited interests, I will consult with an agency ethics official to determine whether this screening arrangement may be modified and notice of such provided to (b)(6) and my principal subordinates.

(b)(6)

cc:

(b)(6)

March 16, 2017

Heather Gottry
Deputy General Counsel and
Alternate Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Ms. Gottry:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interest (b)(6) I acquired this interest subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or passive acquisition of prohibited financial interests apply to me. See 17 C.F.R. Part 140.735-2a(d). As such, I have decided to divest this interest and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest(s) until this prohibited interest is divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)



June 20, 2017

Daniel J. Davis
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Davis:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interest in the (b)(6) (b)(6) in an amount less than (b)(6) I acquired this interest prior to my commencement of employment with the CFTC, and as such I could elect to retain this prohibited interest. See 17 C.F.R. Part 140.735-2a(d). However, I have decided to divest this interest and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable

effect on my prohibited interest(s) until this prohibited interest is *(these prohibited interests are)* divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)

(b)(6)

23 June 2017

Daniel J. Davis
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Davis:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interest: (b)(6)

(b)(6)

I acquired this interest subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or passive acquisition of prohibited financial interests apply to me. See 17 C.F.R. Part 140.735-2a(d). As such, I will sell this interest and submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest until this prohibited interest is divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. In addition, I have advised the managers of (b)(6) as to the restrictions I have as a CFTC employee. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)

(b)(6)

January 20, 2017

Jonathan L. Marcus, Esq.
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Marcus:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interest: (b)(6)

(b)(6) I acquired this interest subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or passive acquisition of prohibited financial interests apply to me. *See* 17 C.F.R. Part 140.735-2a(d). As such, I have decided to divest this interest and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest(s) until this prohibited interest is divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)



MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: Sharon Y. Bowen *SYB*
Commissioner
Commodity Futures Trading Commission

SUBJECT: Ensuring Compliance with Ethics Commitments

DATE: July 27, 2016

This memorandum revises my screening arrangement dated October 30, 2014, and sets forth the screening procedures that I have established to ensure compliance with the terms of my Ethics Agreement, dated December 9, 2013, which I executed prior to my appointment as Commissioner of the Commodity Futures Trading Commission.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or that could cause a reasonable person to question my impartiality.

Additionally, I agree that if I maintain a managed account or authorize an investment advisor to make investments on my or my spouse's behalf, I will review all purchases with agency ethics counsel prior to purchase or direct that purchases be limited to widely diversified mutual funds as defined in 5 C.F.R. § 2640.102(a) that comply with the prohibitions in the Commission's supplemental regulations at 17 C.F.R. § 140.735-2a.

I resigned as a partner with the law firm of (b)(6) by
retiring from my position on (b)(6)

(b)(6)

(b)(6)

(b)(6)

I will not participate personally and substantially in any particular matter that will have a direct and predictable effect on the ability or willingness of the firm to pay the fixed retirement benefit, unless I first obtain a written waiver, pursuant to 18 U.S.C.208(b)(1).

In order to help ensure that I do not participate in any particular matter that will have a direct and predictable effect on the ability or willingness of (b)(6)

(b)(6)

I have taken or will take the following steps:

1. I have instructed (b)(6) to screen all matters directed to my attention that involve outside entities or that require my participation to determine if they involve any of the entities or organizations listed above.
2. I will provide (b)(6) with a copy of this memorandum and my most recent OGE Form 278e, so that (b)(6) may fully understand the purpose and scope of my recusal obligations and this screening arrangement. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing (b)(6) to seek the assistance of an agency ethics official if (b)(6) is ever uncertain whether or not I may participate in a matter.
3. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to (b)(6) without my knowledge or involvement.
4. In consultation with an agency ethics official, I will revise and update my ethics agreement and/or this memorandum whenever that is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties.

5. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and my principal subordinates.

Cc: Chairman Massad
Commissioner Giancarlo
Executive Director
Director of Enforcement
Director of DSIO
Director of DMO
Director of DCR
Director of OIA
(b)(6)
Office of the Secretariat, Chris
Kirkpatrick

March 22, 2017

Heather Gottry
Deputy General Counsel and
Alternate Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Ms. Gottry:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interest: (b)(6)
(b)(6) I acquired this interest prior to my commencement of employment with the CFTC, and as such I could elect to retain this prohibited interest. See 17 C.F.R. Part 140.735-2a(d). However, I have decided to divest this interest and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest until this prohibited interest is divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, NFA BASIC before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)



February 28, 2017

Heather Gottry
Deputy General Counsel and
Alternate Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Ms. Gottry:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102, prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibits employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

(b)(6) currently holds the following prohibited financial interests: (b)(6)
(b)(6) I acquired these interests when I (b)(6)
(b)(6) could elect to retain these prohibited interests in reliance upon
an exception to the rules. *See* 17 C.F.R. Part 140.735-2a(d). However, (b)(6) has decided to
divest these interests and I will submit evidence of the sales to CFTC Ethics within thirty (30)
days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interests until these prohibited interests are divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)

A large rectangular area is redacted with a solid purple fill. The text "(b)(6)" is written in the top-left corner of this redacted area.

February 23, 2017

Heather Gottry.
Deputy General Counsel and
Alternate Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Ms. Gottry:

The purpose of this letter is to describe the action that I will take to divest a prohibited interest as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interests: (b)(6)

(b)(6)	I acquired
(b)(6)	
(b)(6)	subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or passive acquisition of prohibited financial interests apply to me. See 17

C.F.R. Part 140.735-2a(d). As such, I have decided to divest all three prohibited interests and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest(s) until these prohibited interests are divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)



June 5, 2014

MEMORANDUM FOR TIMOTHY G. MASSAD

FROM: NEIL EGGLESTON 

SUBJECT: Limited Waiver Under 18 U.S.C. § 208(b)(1)

This memorandum provides you with a waiver, pursuant to 18 U.S.C. § 208(b)(1), that, subject to limitations stated below, allows you to participate in your positions as Chairman and a Commissioner of the Commodity Futures Trading Commission in particular matters of general applicability affecting your financial interests in (b)(6). This waiver is being issued based on full disclosure of your financial interests and consideration of the nature and circumstances of matters in which you may be involved as the Chairman and a Commissioner of the Commodity Futures Trading Commission.

An executive branch employee is prohibited by 18 U.S.C. § 208(a) from participating personally and substantially in an official capacity in any particular matter that has a direct and predictable effect on either the employee's financial interests or the interests of certain other persons whose interests are imputed to the employee. The term "particular matter" includes only matters that involve deliberation, decision, or action that is focused on the interests of specific persons or a discrete and identifiable class of persons. The term may include matters that do not involve formal parties and may extend to legislation or policymaking that is narrowly focused on the interests of a discrete and identifiable class of persons. The term does not, however, include consideration or adoption of broad policy options directed to the interests of a large and diverse group of persons. The term does not include any matter that is not focused on the interests of specific persons or a discrete and identifiable class of persons.

In your most recent public financial disclosure report you disclosed that you have a securities interest in (b)(6). This interest is (b)(6).

(b)(6)
(b)(6) You have disclosed that (b)(6) established the (b)(6) (b)(6) for the benefit of (b)(6). You have disclosed that the (b)(6) each hold a minority limited partnership interest in (b)(6) a partnership created by (b)(6). It is the partnership, not the (b)(6) which holds (b)(6) securities. You have fully disclosed all of the assets that make up your (b)(6) interest in (b)(6) on your most recent public financial disclosure report. On November 9, 2013, you (b)(6) and you do not control the investments of either the (b)(6) or the (b)(6). You have stated that (b)(6) controls the partnership and its investments, and that (b)(6) has the right to substitute other assets for the interest in the partnership held by (b)(6).

As the Chairman and a Commissioner of the Commodity Futures Trading Commission, you serve as the chief administrative officer of the Commission and preside at hearings before the

Commission. The Commission protects commodity futures and swaps market users, consumers and the public at large from fraud, manipulation, and other abusive practices, and systemic risk and fosters open, transparent, competitive, and financially sound markets. The agency administers the Commodity Exchange Act (CEA), 7 U.S.C. Section 1, *et. seq.* The CEA establishes a comprehensive regulatory structure to oversee the futures trading complex, including futures trading in all goods, articles, services, rights and interests; commodity options trading; and leverage trading in gold and silver bullion and coins. The Dodd-Frank Act amended the CEA to establish a new regulatory framework for swaps and to enhance the regulatory jurisdiction of the Commission.

As Chairman and a Commissioner, you solely exercise the executive and administrative functions of the Commission, including functions of the Commission with respect to the appointment and supervision of personnel employed under the Commission, the distribution of business among such personnel and among administrative units of the Commission, and the use and expenditure of funds, according to budget categories, plans, programs, and priorities established and approved by the Commission.

Your reported financial interest in (b)(6) necessitates your recusal not only from particular matters involving specific parties in which (b)(6) is a party or represents a party, but also from particular matters of general applicability that directly and predictably affect the financial interests of (b)(6), including rulemakings. Given the Chairman's oversight of staff actions and role in rulemakings, your recusal from particular matters of general applicability affecting (b)(6) would significantly limit your ability to function as Chairman. For example, your ability to fully participate in surveillance matters on the energy markets, discussions of margins on energy, discussions on end user requirements, and discussions on jurisdiction of swaps oversight on certain products would be limited.

The prohibition established in 18 U.S.C. § 208(a) may be waived under 18 U.S.C. § 208(b)(1) where a determination is made that an employee's financial interest is not so substantial as to be deemed likely to affect the integrity of the services that the government may expect from the employee. Based on the totality of the circumstances, I have determined that the financial interests subject to this waiver are not so substantial as to be deemed likely to affect the integrity of your services to the government.

In making this determination, I have considered that your financial interest in (b)(6) is less than (b)(6) of total value of your investment portfolio. As discussed above, your financial interest in (b)(6) is held as part of your (b)(6). (b)(6) You have (b)(6) and have disclosed that there are a number of other beneficiaries of (b)(6) that would be affected by the divestiture of this asset. Further, you cannot direct that the asset be divested by (b)(6). Your financial interest in (b)(6) is a small percentage of the total value of your assets and, without a waiver, the resulting recusal would significantly limit your ability to participate in policy discussions, guidelines, rulemakings, and other particular matters affecting energy matters before the Commission.

As noted above, I am imposing limitations on the scope of this waiver. Specifically, you may not participate personally and substantially in a particular matter involving specific parties in which (b)(6) is a party or represents a party. Additionally, (b)(5)

(b)(5)

The U.S. Office of Government Ethics has been consulted regarding this waiver.



U.S. COMMODITY FUTURES TRADING COMMISSION

140 Broadway, 19th Floor
New York, New York 10005
Telephone: (646) 746-9700
Facsimile: (646) 746-9940

Division of
Enforcement

December 28, 2016

ELECTRONIC MAIL

Jonathan L. Marcus, Esq.
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Marcus:

The purpose of this letter is to describe the action that (b)(6) will take to divest prohibited interests as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

(b)(6) currently holds the following prohibited financial interests (b)(6)
(b)(6) acquired these interests subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or

passive acquisition of prohibited financial interests apply to me. *See* 17 C.F.R. Part 140.735-2a(d). As such, (b)(6) has decided to divest these interests and will submit evidence of the sale to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interests until these prohibited interests are divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)



MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: (b)(6) DSIO

SUBJECT: Revised Ethics Compliance and Screening Mechanism Commitments

DATE: December 14, 2015

The Ethics Compliance and Screening Mechanism Commitments memorandum dated November 9, 2015 is hereby rescinded in its entirety and replaced with this revised memorandum.

In accordance with the provisions 18 U.S.C. § 208, a criminal statute, and its implementing regulation at 5 C.F.R. § 2640, as well as the Commission's Supplemental Standards of Ethical Conduct, 5 C.F.R. Part 5101.102, and the Commission's Code of Conduct, 17 C.F.R. Part 140.735-2a, I am disqualified from participating personally and substantially as an employee of the Executive Branch of the United States in any particular matter as specified in this memorandum that would have a direct and predictable effect on any of my financial interests listed below including their parent organization, all subsidiaries, all affiliates, and joint ventures (current and future):

(b)(6)

I also understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or could cause a reasonable person to question my impartiality.

I understand that a particular matter involving specific parties includes any judicial or other proceeding, application, request for an interpretation or other determination, contract, claim, controversy, investigation, or other particular matter involving a specific party or parties. The term typically involves a specific proceeding affecting the legal rights of the parties, or an isolatable transaction or related set of transactions between identified parties.

I understand that particular matters of general applicability include those particular matters that are focused on the interests of a discrete and identifiable class of persons, but do not involve specific parties, such as certain rulemakings.

I further understand that when my ownership of a security is a disqualifying financial interest, I may participate in any particular matter involving specific parties where the aggregate security holdings in the specific parties do not exceed \$15,000. 5 C.F.R. § 2640.202(a)(2).

(b)(6)

In addition, I understand that I may participate in any particular matter involving specific parties in which the disqualifying financial interest arises from my financial interests in one or more entities that are not parties to the matter but that are affected by the matter if the securities are publicly traded, and my aggregate holdings in all affected parties does not exceed \$25,000.

(b)(6)

Regarding particular matters where one or more of my remaining financial sector holdings is not a party to the particular matter, but could be affected by the outcome of the particular matter, I will recuse myself from participating in such particular matters if my aggregate holdings of the affected parties exceeds \$25,000.

Finally, when my ownership of a security is a disqualifying financial interest, I understand that I may participate in any particular matter of general applicability where the securities are publicly traded, the holding in one such security in the sector does not exceed \$25,000, and for all affected securities in the sector, \$50,000. 5 C.F.R. § 2640.202(a)(2)(c)(i)(A)&(B).

(b)(6)

(b)(6)

As such, I am not recused from participating in particular matters of general applicability involving the financial sector.

In addition, I have retained financial holdings in the energy sector companies of (b)(6)

(b)(6)

(b)(6)

I will continue to monitor the value of my both my energy and financial sector holdings to ensure that I do not participate in any particular matters where these interests cause me to have a conflict of interest. I will notify my screener and an agency ethics official immediately should the values of these securities increase or decrease to levels that would impact the application of the above rules.

In order to help ensure that I do not participate in matters that would have a direct and predictable effect on any of my financial interests relating to any of the entities listed above, I have taken or will take the following steps:

1. I have instructed (b)(6) to screen all matters directed to my attention that involve (b)(6) and its subsidiaries and/or particular matters where the

above listed parties are not parties to the matter, but could be affected by the matter to determine whether the matters would have a direct and predictable effect on any of my financial interests.

2. For those matters for which I am recused, (b)(6) will take action or re-assign the particular matter without my involvement or knowledge of the particulars of the matter.
3. I will continue to personally take my calls and screen my e-mail. If a particular matter involving a potential conflict of interest is directed to my attention, I will not take any action, but immediately forward the matter to (b)(6) for action or assignment, without my further involvement or knowledge of the particulars of the matter.
4. I will provide (b)(6) with a copy of this memorandum and my most recent OGE Form 278e, so that he may fully understand the purpose and scope of my recusal obligations and this screening arrangement. It is my understanding that (b)(6) will seek the advice of an agency ethics official if (b)(6) is ever uncertain whether or not I may participate in a particular matter.
5. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement and the requirement to forward all matters directed to my attention to (b)(6) as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to (b)(6) without my involvement or knowledge of the particulars of the matter.
6. In consultation with an agency ethics official, I will revise and update this memorandum whenever that is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties.
7. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and my principal subordinates.

This screening arrangement remains in effect until further notice.

(b)(6)

cc:

(b)(6)

June 21, 2017

Daniel J. Davis
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Davis:

The purpose of this letter is to describe the action that I will take to divest prohibited interests as described in 17 C.F.R. Part 140.735-2a(b).

I understand that the CFTC's supplemental standards of ethical conduct for employees, at 5 C.F.R. Part 5101.102 prohibits employees from engaging in business or financial transactions, or holding business or financial interests, prohibited by the Commodity Exchange Act and as set forth in the CFTC's regulation concerning the conduct of employees of the Commission at 17 C.F.R. Part 140.735-2 and 2a.

I further understand that the CFTC's regulation concerning the conduct of employees of the Commission prohibit employees from holding financial interests, through ownership of securities or otherwise, in any person registered with the Commission (including futures commission merchants, associated persons and agents of futures commission merchants, floor brokers, commodity trading advisors and commodity pool operators, and any other persons required to be registered in a fashion similar to any of the above under the Commodity Exchange Act or pursuant to any rule or regulation promulgated by the Commission), or any contract market, swap execution facility, swap data repository, board of trade, or other trading facility, or any derivatives clearing organization subject to regulation or oversight by the Commission. 17 C.F.R. Part 140.735-2a(b)(1).

I currently hold the following prohibited financial interests:

(b)(6)



I acquired these interests subsequent to my commencement of employment with the CFTC, and I have been informed that CFTC Ethics is unable to determine whether any of the exemptions that permit the retention or passive acquisition of prohibited financial interests apply to me. *See* 17 C.F.R. Part 140.735-2a(d). As such, I have decided to divest these interests and will submit evidence of the sales to CFTC Ethics within thirty (30) days of the date of this letter.

I understand that as required by 18 U.S.C. § 208(a), I am recused from participating personally and substantially in any particular matters that would have a direct and predictable effect on my prohibited interest(s) until these prohibited interests are divested.

I will ensure that all of my future purchases of assets will not, at the time of purchase, cause me to violate the conflict of interest statute at 18 U.S.C. § 208, the CFTC's supplemental standards of ethical conduct for employees, and the CFTC's regulation concerning the conduct of employees. As due diligence, in addition to monitoring my daily workload for conflicts, I will search the National Futures Association Background Affiliation Status Information Center, [NFA BASIC](#) before purchasing or selling new interests in stocks and mutual funds. Should I have questions, I will contact a CFTC ethics official for advice.

Sincerely,

(b)(6)



August 12, 2013

Jonathan L. Marcus
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Marcus:

This letter describes the steps I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner for the Commodity Futures Trading Commission.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with (b)(6). Following my resignation and pursuant to the terms of a pre-existing separation package consistent with the terms of my Employment Agreement, I will receive from (b)(6) a severance payment in the amount of (b)(6). (b)(6) will make this payment to me before I assume the duties of the position of Commissioner. For a period of two years from the date of my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) or any of its wholly owned subsidiaries is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.503(c). Pursuant to the terms of my Employment Agreement, I am also entitled to a one year option for medical benefits upon my resignation. I will forfeit this benefit upon my resignation from (b)(6).

I and (b)(6) own shares of (b)(6) common stock. Pursuant to a (b)(6) (b)(6) with (b)(6), I also own vested stock options for shares of (b)(6) common stock. Pursuant to a (b)(6) with (b)(6), I own unvested restricted stock units. I do not own unvested stock options or any vested restricted stock units for shares of (b)(6) common stock.

My unvested restricted stock units will vest upon my resignation from (b)(6). Within 90 days of my appointment, I will divest all of my and (b)(6) common stock, all of my stock options, and all of my restricted stock units. If I divest the stock options by exercising them, I will divest the resulting stock within 90 days of my appointment. Until I have divested all of these financial interests, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of (b)(6) or any of its wholly owned subsidiaries unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

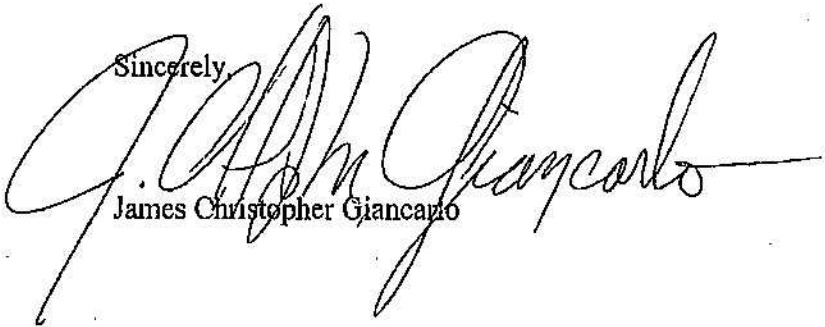
Prior to my appointment, I will resign my position as (b)(6). (b)(6) I did not receive any fees for services that I provided during my appointment and do not have any beneficial interest in the holdings of the (b)(6). I also will not participate personally or substantially in any particular matter involving specific parties in which any of these (b)(6) is a party, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

I have resigned from my positions from the following entities: (b)(6)
(b)(6)
(b)(6) Prior to appointment, I will also resign from the (b)(6)
(b)(6) For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Finally, I understand that as an appointee I am required to sign the Ethics Pledge (Exec Order No. 13490) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this and any other ethics agreement.


I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with other ethics agreements of Presidential nominees who file financial reports.

Sincerely,


James Christopher Giancarlo

MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: Sharon Y. Bowen 
Commissioner
Commodity Futures Trading Commission

SUBJECT: Ensuring Compliance with Ethics Commitments

DATE: October 30, 2014

This memorandum sets forth the screening procedures that I have established to ensure compliance with the terms of my Ethics Agreement, dated December 9, 2013, which I executed prior to my appointment as Commissioner of the Commodity Futures Trading Commission.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or that could cause a reasonable person to question my impartiality.

Additionally, I agree that if I maintain a managed account or authorize an investment advisor to make investments on my or my spouse's behalf, I will review all purchases with agency ethics counsel prior to purchase or direct that purchases be limited to widely diversified mutual funds as defined in 5 C.F.R. § 2640.102(a) that comply with the prohibitions in the Commission's supplemental regulations at 17 C.F.R. § 140.735-2a.

I resigned as a partner with the law firm of (b)(6) by retiring from my position on June 5, 2014. I have received (b)(6)

(b)(6)

Until I have received the (b)(6) I will not participate personally and substantially in any particular matter that will have a direct and predictable effect on the ability or willingness of the (b)(6) unless I first obtain a written waiver, pursuant to 18 U.S.C.208(b)(1). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which a former (b)(6) client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I have resigned from my positions with (b)(6)

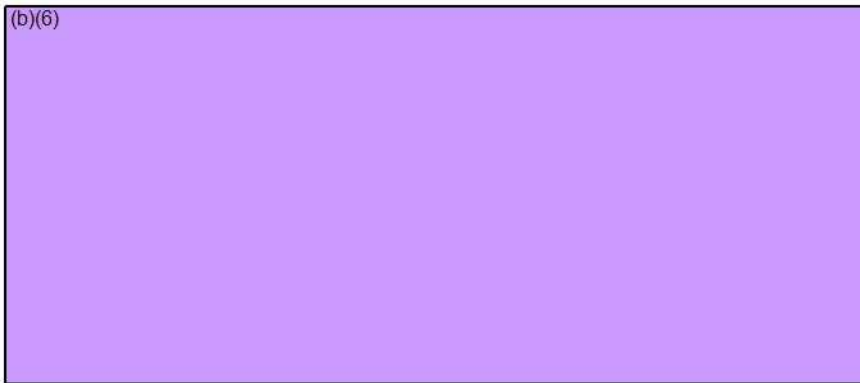
(b)(6)

(b)(6) For a period of one year after my resignation from these entities, I will not participate personally and substantially in any particular matter involving

specific parties in which any of these entities is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Pursuant to paragraph 2 of the Ethics Pledge, I will not for a period of 2 years from June 3, 2014, participate in any particular matter involving specific parties that is directly and substantially related to my former employers or former clients. I understand that this recusal obligation includes meetings and conversations with my former employers and clients relating to the performance of my official duties, unless the meeting or conversation is about a particular matter of general applicability and participation in the meeting or other event is open to all interested parties.

Following is a list of my former employers and clients as defined by the Ethics Pledge:



In order to help ensure that I do not participate in matters relating to any of the entities listed above, I have taken or will take the following steps:


1. I have instructed (b)(6) to screen all matters directed to my attention that involve outside entities or that require my participation to determine if they involve any of the entities or organizations listed above.
2. I will provide (b)(6) with a copy of this memorandum, my most recent OGE Form 278, and ethics agreement so that (b)(6) may fully understand the purpose and scope of my recusal obligations and this screening arrangement. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing (b)(6) to seek the assistance of an agency ethics official if (b)(6) is ever uncertain whether or not I may participate in a matter.

3. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to (b)(6) without my knowledge or involvement.
4. In consultation with an agency ethics official, I will revise and update my ethics agreement and/or this memorandum whenever that is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties.
5. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and my principal subordinates.

Cc: Chairman Massad
Commissioner Wetjen
Commissioner Giancarlo
Executive Director
Director of Enforcement
Director of DSIO
Director of DMO
Director of DCR
Director of OIA
Secretary to the Commission
(b)(6)

MEMORANDUM

TO: Jonathan L. Marcus
General Counsel and Designated Agency Ethics Official

FROM: J. Christopher Giancarlo 
Commissioner
Commodity Futures Trading Commission

SUBJECT: Ensuring Compliance with Ethics Commitments

DATE: December 15, 2016

This memorandum sets forth the screening procedures that I have established to ensure compliance with the terms of my Ethics Agreement, dated August 12, 2013, which I executed prior to my appointment as a Commissioner of the Commodity Futures Trading Commission ("CFTC"). This memorandum updates my earlier memoranda, dated September 29, 2014, and April 2, 2015.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment. I also understand that it is my responsibility to continually monitor my financial interests and those imputed to me in order to make certain that I am not involved in any matter that affects my financial interests or that could cause a reasonable person to question my impartiality.

The period of two years has expired from June 6, 2014, the date that I received a severance payment from (b)(6) pursuant to the terms of a pre-existing separation package that was consistent with the terms of my Employment Agreement, and two years has expired from the date of my appointment to the CFTC on June 16, 2014. Consequently, I no longer have an obligation to not participate personally and substantially in any particular matters involving specific parties in which (b)(6) or any of its wholly owned subsidiaries, (b)(6) or any of its wholly owned subsidiaries, or (b)(6) is a party, or represents a party pursuant 5 C.F.R. § 2635.503(c) and paragraph 2 of the Ethics Pledge.

I am the personal representative and executor of (b)(6)
(b)(6) I am also (b)(6) established in connection
with (b)(6) whose assets I reported on my 2016 Annual OGE 278 Financial
Disclosure Report. I will not participate personally and substantially as a Commissioner in any

particular matter that has a direct and predictable effect on the financial interests of (b)(6) (b)(6) unless I first obtain a written waiver pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2). In addition, I will not participate personally and substantially as a Commissioner in any particular matter involving specific parties of (b)(6) that is a party or represents a party, unless I am first authorized to participate pursuant to 5 C.F.R. § 2635.502(d).

As required by my Ethics Agreement, I timely divested all of my and (b)(6) financial interests in (b)(6) within the 90 days required by my ethics agreement dated August 12, 2013, and Office of Government Ethics regulations. On June 10, 2014, (b)(6) (b)(6)

Compliance Review and Screening

In order to ensure compliance with my ethics obligations I have taken or will take the following steps:

1. I have instructed (b)(6) to screen all matters directed to my attention that involve outside entities to determine whether my participation is appropriate.
2. I have or will provide (b)(6) with a copy of this memorandum, a copy of my memoranda, dated September 29, 2014, and April 2, 2015, my most recent OGE Form 278 and any subsequently filed transaction reports, and my August 12, 2013 ethics agreement so that (b)(6) may fully understand the purpose and scope of my recusal obligations and this screening arrangement. In order to help ensure that I do not inadvertently participate in matters from which I should be recused, I am directing (b)(6) to seek the assistance of an agency ethics official if (b)(6) is ever uncertain whether or not I may participate in a matter.
3. I have advised my principal subordinates of my recusal obligations and will advise them of this screening arrangement as set forth in this memorandum. I will further instruct my principal subordinates that all inquiries and comments involving my recusal obligations should be directed to (b)(6) without my knowledge or involvement.
4. In consultation with an agency ethics official, I will revise this memorandum whenever it is warranted by changed circumstances, including changes to my financial interests, my personal or business relationships, or the nature of my official duties.
5. In the event of any changes to this screening arrangement, I will provide a copy of the revised screening arrangement memorandum to (b)(6) and my principal subordinates.

Cc: Chairman Massad
Commissioner Bowen
Executive Director
Director of Enforcement
Director of DSIO
Director of DMO
Director of DCR
Secretary to the Commission

(b)(6)

December 9, 2013

Jonathan L. Marcus, Esq.
General Counsel and
Designated Ethics Official
Office of the General Counsel
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Dear Mr. Marcus:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Commissioner, Commodity Futures Trading Commission ("CFTC").

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter that has a direct and predictable effect on my financial interests or those of any person whose interests are imputed to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position as (b)(6) with the law firm of (b)(6). I currently have a capital account with (b)(6) and I will receive a refund of that account after my resignation as (b)(6). Until I have received this refund, I will not participate personally and substantially in any particular matter that will have a direct and predictable effect on the ability or willingness of the firm to pay this refund, unless I first obtain a written waiver, pursuant to 18 U.S.C. 208(b)(1). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, I will not participate personally and substantially in any particular matter involving specific parties in which a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

If I remain (b)(6) with (b)(6) as of February 15, 2014, I will be eligible to receive a bonus for work performed in 2013 if (b)(6) determines that bonus payments are warranted. (b)(6) will use an objective formula to calculate any

potential bonus. Until I have received this potential bonus payment, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of (b)(6) to make this payment to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). Further, if I am employed with (b)(6) as of December 31, 2013, I will be enrolled in a (b)(6). Pursuant to the terms of participation in the (b)(6) my account balance is payable in a lump sum distribution at the time of my retirement. Until I have received this lump sum distribution, I will not participate personally and substantially in any particular matter that will have a direct and predictable effect on the ability or willingness of the firm to pay this distribution, unless I first obtain a written waiver, pursuant to 18 U.S.C. 208(b)(1).

Pursuant to the partnership agreement with (b)(6) I am eligible to receive a fixed retirement benefit equal to approximately three years total compensation, based on the highest five years of the most recent fifteen years, paid out monthly over ten years. Until I have received these payments, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the ability or willingness of (b)(6) to make these payments to me, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position as (b)(6) (b)(6). For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which (b)(6) is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my (b)(6) (b)(6) (b)(6) (b)(6). For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

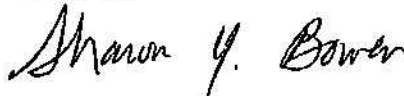
I will divest my interests in the (b)(6) (b)(6) (b)(6). With regard to each of these entities, I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that I may be eligible to request a Certificate of Divestiture for these assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will divest these assets within 90 days of my confirmation and will invest the proceeds in non-conflicting assets.

I have disclosed in my financial disclosure report a financial interest in the (b)(6).
(b)(6) However, the funds' managers declined to permit me to disclose confidential information regarding the holdings of the underlying funds in which the (b)(6) invest. Therefore, I will divest my financial interest in the (b)(6) (b)(6) within 90 days of my confirmation. Until I have divested the (b)(6) (b)(6) I will not participate personally and substantially in any particular matter in which to my knowledge I have a financial interest, if the particular matter has a direct and predictable effect on the financial interests of either the (b)(6) (b)(6) or any of their underlying assets, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that I may be eligible to request a Certificate of Divestiture for these assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will divest these assets within 90 days of my confirmation and will invest the proceeds in non-conflicting assets.

I understand that as an appointee I am required to sign the Ethics Pledge (Exec Order No. 13490) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this and any other ethics agreement.

Finally, I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with other ethics agreements of Presidential nominees who file public financial disclosure reports.

Sincerely,



Sharon Y. Bowen

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/16/2015 1:44:53 PM
To: Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]
CC: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: Speaking Engagement for Chairman Massad in Montreal on April 23

After reviewing the invitation to Chairman Massad from the Financial Technologies Forum to present the keynote address at the DerivOpsNorth America ("Conference") on April 22, 2015 in Chicago, Illinois, CFTC Ethics has determined that that Chairman Massad may speak and accept the offer of free attendance on the day of the event consistent with 5 C.F.R. § 2635.204(g)(1) and the Office of Government Ethics Legal Advisory, LA-12-05 (September 7, 2012). (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/16/2015 1:50:25 PM
To: Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]
CC: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: Ethics Write-Up on the Reception

CFTC Ethics has reviewed the invitation extended to the Chairman by ISDA to attend the ISDA Members' Reception ("Reception") at Arsenal Art Contemporanea on April 22, 2015. (b)(5)

(b)(5)

Therefore, consistent with the Ethics Pledge, the Chairman and other Schedule C employees of the CFTC may not accept the "gift of free attendance" (b)(5)

(b)(5)

seq. However, if the Chairman or other Schedule C employees would like to attend the Reception, they may pay ISDA for the per person cost of attending the Reception. 5 C.F.R. §2635.203(b)(9). (b)(5)

(b)(5)

For Non-PAS/Schedule C attendees of the Reception, CFTC Ethics has determined that the Reception qualifies as a "widely attended gathering" as defined by 5 C.F.R. Part 2635.204(g)(2) of the Standards of Ethics for Employees of the Executive Branch (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/16/2015 1:48:43 PM
To: Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]
CC: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: Speaking Engagement for Chairman Massad in Montreal on April 23

After reviewing the invitation to Chairman Massad to present the keynote address at the International Swaps and Derivatives Association ("ISDA")'s 30th Annual Meeting ("Annual Meeting") on April 23, 2015 in Montreal, Canada, CFTC Ethics has determined that that Chairman Massad may accept the invitation consistent with 5 C.F.R. § 2635.204(g)(1) and the Office of Government Ethics Legal Advisory, LA-12-05 (September 7, 2012). (b)(5)

(b)(5)

Communication with Former CFTC Staff at the ISDA 30th Annual Meeting

Certain former CFTC staff will likely be in attendance at ISDA 30th Annual Meeting events and the post-employment statutes and ethics regulations will potentially limit their ability to communicate and engage with you about official Commission business.

(b)(5)

(b)(5)



If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/21/2015 1:34:43 PM
To: Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]
CC: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: Speaking Invitation 19th Annual Energy Risk Summit USA, May 12, 2015

After reviewing the invitation to Chairman Massad from Incisive Media to present a keynote address at the 19th Annual EnergyRisk Summit USA ("Summit") on May 12, 2015 in Houston, Texas, CFTC Ethics has determined that that he may accept the invitation consistent with 5 C.F.R. § 2635.204(g)(1) and the Office of Government Ethics Legal Advisory, LA-12-05 (September 7, 2012). (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/21/2015 7:06:52 PM
To: Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]
CC: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: CME Group Meeting/Speaking Request - May 13 for Chairman Massad

After reviewing the invitation to Chairman Massad from the CME Group to present the keynote address at CME Washington Outlook Program lunch ("CME Outlook Program") on May 13, 2015 Washington, D.C., CFTC Ethics has determined that that he may accept the invitation consistent with 5 C.F.R. § 2635.204(g)(1) and the Office of Government Ethics Legal Advisory, LA-12-05 (September 7, 2012). (b)(5)

(b)(5)

Additionally, consistent with guidance from the Office of Government Ethics, certain staff from Chairman Massad's office may also accept the offer of free attendance if his or her presence at the event is deemed essential to Chairman Massad's participation as a speaker at the Annual Meeting. OGE DO-10-003, *Attendance by Staff Accompanying Official Speakers* (Feb. 18, 2010).

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

From: Brown, Karen
Sent: Tuesday, March 31, 2015 3:31 PM
To: Gottry, Heather; Dolan, John
Cc: Ogilvie, Clark; Adamske, Steven; Marcus, Jonathan L.
Subject: Response Requested re CME Group Meeting/Speaking Request - May 13 for Chairman Massad

Kindly review the attached speaking engagement request and reception invitation for Chairman Massad. Please reply at your earliest convenience with guidance on both items.

Many thanks,
Kb☺

Karen Brown
Executive Assistant to Chairman Massad
Commodity Futures Trading Commission
1155 21st St, N.W.
Washington, DC 20581
Direct Dial: 202-418-5880
kbrown@cftc.gov

From: Klein Gray, Anne [<mailto:Anne.KleinGray@cmegroup.com>]
Sent: Tuesday, March 24, 2015 4:03 PM
To: Brown, Karen
Subject: CME Group Meeting/Speaking Request - May 13

Hi Karen. Per our conversation the other day, we would like to invite the Chairman to be our keynote speaker Wednesday, May 13 during our annual Washington Outlook Program. Specifically, we are hoping the Chairman will have time in his schedule to deliver remarks during lunch (12:30 at the Hay Adams Hotel) to a group of approximately 100 CME Group Executives, Board Members, employees, members and other customers. Lunch is scheduled to start at 12:30 pm and we have time blocked to 2pm. we would hope the Chairman could speak for 20 min or so and then take questions from the audience. We can also be flexible with the start time if that would help.

The lunch on May 13 is part of our two day Washington Outlook Program which we host every spring for employee and Board members that are contributors to our PAC. In addition to the lunch, there is a reception and dinner the night before. We have confirmed Speaker Boehner as speaker for that portion of the program. Wednesday evening we host a large reception for our guests, other industry representatives and members of congress.

We hope that Chairman Massad will be able to speak to the group on the 13th and look forward to hearing from you – of course happy to get you more information or discuss details as needed. In addition, we'd like to extend an invitation to the Chairman for him to join us at the dinner on May 12 as well as the large reception the evening of the 13th. The full agenda is attached.

Speak with you soon! Thank you ☺

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/9/2015 9:17:31 PM
To: * Office of Chairman Massad [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office of Chairman Massadbed]; * Office Comm Wetjen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Wetjenb88]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Reinhart, Scott [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Reinhart, Scotttd48]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Walker, Petal [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Walker, Petal7ec]; Blase, Marcia K. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=mlblaze]; Goggins, Jason [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goggins, Jasona38]
CC: Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]
Subject: Boca Raton Dinner – Wednesday, March 11

This e-mail provides additional ethics guidance for invited CFTC staff who have been invited to attend Evercore's annual dinner ("Dinner") hosted by Jane Gladstone in the Sculpture Garden of the Boca Raton Museum of Art on March 11, 2015. We previously advised CFTC invitees that the Dinner qualified as a "widely attended gathering" as defined by 5 C.F.R. § 2635.204(g)(2) of the Standards of Ethics for Employees of the Executive Branch and that CFTC staff could accept the gift of free attendance to the Dinner. (b)(5)

(b)(5)

After approving the Dinner, CFTC Ethics was informed that the invitation also included a tour of the Boca Raton Museum of Art and a cocktail reception immediately prior to Dinner. We have reviewed the expanded invitation and have determined that you may accept the gift of free attendance to the Dinner as well as to the cocktail party and tour. The cocktail reception qualifies independently as a "widely attended gathering" under 5 C.F.R. § 2635.204(g)(2) and the tour can be considered an integral part of both the Dinner and the cocktail reception consistent with guidance in 5 C.F.R. § 2635.204(g)(4).

(b)(5)

Please let us know if you have questions about this event or if we can be of further assistance. Thank you.

Message

From: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E]
Sent: 7/2/2015 4:22:49 PM
To: Stewart, Lawranne [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Stewart, Lawrannedfc]
CC: Massad, Timothy [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Massad, Timothyc4e]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreyeda]; Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Claussen, Cory [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Claussen, Coryd01]
Subject: RE: PCCE Advisory Board

Lawranne – I just received confirmation from the Office of White House Counsel that the Chairman and other PAS officials in the Administration are not permitted to accept outside positions while in office. This restriction is not limited to paid or fiduciary positions and would cover advisory board positions as well. Please let me know if it would be helpful to discuss further or if I can be of any additional assistance. Thank you.

- Heather

From: Marcus, Jonathan L.
Sent: Friday, June 26, 2015 3:07 PM
To: Gottry, Heather
Subject: FW: PCCE Advisory Board

From: Stewart, Lawranne
Sent: Friday, June 26, 2015 2:56 PM
To: Brown, Karen; Massad, Timothy
Cc: Ogilvie, Clark; Griffin, Ward P; Bandman, Jeffrey; Adamske, Steven; Claussen, Cory; Marcus, Jonathan L.
Subject: RE: PCCE Advisory Board

FYI, I have asked Heather Gottry to give me the rules on advisory committee membership, (b)(5)

(b)(5)

From: Brown, Karen
Sent: Friday, June 26, 2015 2:54 PM
To: Massad, Timothy
Cc: Ogilvie, Clark; Stewart, Lawranne; Griffin, Ward P; Bandman, Jeffrey; Adamske, Steven; Claussen, Cory; Marcus, Jonathan L.
Subject: FW: PCCE Advisory Board

Tim,

Printed a copy and placed in your inbox.

Many thanks,
Kb☺

Karen Brown
Executive Assistant to Chairman Massad
Commodity Futures Trading Commission
1155 21st St, N.W.
Washington, DC 20581
Direct Dial: 202-418-5880
kbrown@cftc.gov

From: Arlen, Jennifer [<mailto:ArlenJ@mercury.law.nyu.edu>]
Sent: Friday, June 26, 2015 2:47 PM
To: Brown, Karen
Cc: Arlen, Jennifer
Subject: PCCE Advisory Board

Dear Mr. Massad,

I wanted to write to follow-up on our invitation to join the Advisory Board of the NYU Program on Corporate Compliance. I sent you the materials next week. We are at the very early stages of the invitation process and have only sent 6-7 invitations. I wanted to let you know that Judge Jed Rakoff, Judge Ray Lohier, Judge Patti Saris and Judge John Gleeson all agreed to join. Andrew Weissmann, head of the DOJ Fraud Section, has given a tentative yes pending clearance from their ethics people. Marshall Miller has also indicated interest. We are in the process of scheduling a call. At this point, we only have one other invitation outstanding (beside yours). We are proceeding deliberately in order to be sure we have a balanced board of nationally and internationally recognized experts. Shortly, we will invite people from the private side. One of those will include Robert Werner, former director of FinCEN and OFCA, who has been involved with our program (he is also a former classmate).

Here is a link to our program:
<http://www.law.nyu.edu/corporatecompliance>

I want to emphasize something that is in the letter: PCCE does not file amicus briefs or otherwise take policy positions. We focus on invitation-only Chatham House Rule event (though also do some open events, such as Attorney General Eric Holder's speech last fall).

We are very much hoping that you will participate on our Advisory Board.

Yours,

Jennifer Arlen

Professor Jennifer Arlen
Norma Z. Paige Professor of Law
Co-Director, Program on Corporate Compliance and Enforcement
NYU School of Law
40 Washington Square South
New York, NY 10012
212-992-8842

Message

From: Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=GOTTRY, HEATHER27E]
Sent: 4/7/2015 10:49:29 PM
To: Massad, Timothy [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Massad, Timothyc4e]
Subject: Your OGE 278
Attachments: Massad Nominee 278 (Certified).pdf

Tim – As requested, attached please find a copy of your fully certified nominee OGE 278 Public Financial Disclosure report. We also have a time set up on Thursday to walk you through the new electronic filing system. Please let me know if you have any questions or if we can be of any assistance in the interim. Thank you.

- Heather

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/4/2015 5:13:40 PM
To: * Office of Chairman Massad [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office of Chairman Massadbed]; * Office Comm Wetjen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Wetjenb88]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; * Office Comm Giancarlo [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Giancarlof78]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreya]; Goggins, Jason [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goggins, Jasona38]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Zaidi, Amir [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Azaidi]; Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Castillo, Miguel [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Castillo, Miguel5ba]
Subject: FW: 40th annual FIA Boca conference

FIA International Futures Industry Conference March 10-12, 2015

- CFTC has paid the registration fee for your attendance at the FIA Law 40th Annual International Futures Industry Conference (“Conference”) on March 10-12, 2015 in Boca Raton, Florida.
 - You may attend all events listed as part of the meeting agenda and you may also accept food, refreshments, entertainment, instruction and materials furnished to all attendees’ participating in the Conference which includes the “SunGard Makes a Splash” event on March 10, 2015, and the Boca Bayou Reception and the Boca Funk Live! event on March 11, 2015.
 - Please note that the “Futures For Kids Charity Golf Tournament” on March 13, 2015 is a separate and collateral event of the Conference and you will be required to pay the \$295 greens fee to participate in the event.
- Additionally, you may accept certain, limited gifts from prohibited sources at the Conference, including a meal, that have a value of \$20 or less per single occasion, provided that the aggregate value of all gifts from a given source does not exceed \$20 per occasion or total \$50 within a period of one year. 5 C.F.R. § 2635.204(a). (b)(5)
- You may not accept the gift of free attendance, or attend, entertainment collateral to the Conference, or meals taken other than in a group setting with all other attendees unless you pay the cost to attend or without prior approval of the ethics office. As noted above, attendance at the “Futures For Kids Charity Golf Tournament” on March 13, 2015 is a collateral event at the Conference and you will be required to pay the \$295 greens fee to participate in the event.

Communication with Former CFTC Staff at the FIA International Futures Industry Conference

(b)(5)



(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/4/2015 8:19:31 PM
To: * Office of Chairman Massad [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office of Chairman Massadbed]; * Office Comm Wetjen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Wetjenb88]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; * Office Comm Giancarlo [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Giancarlof78]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreyeda]; McGonagle, Vincent A. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=vmcgonagle]; Dietz, Phyllis [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=pdietz]; Silberstein, Myra [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=msilberstein]; Rosenfeld, Robert H. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=rrosenfeld]; Bucsa, Daniel J. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bucsa, Daniel J.4d0]; Goggins, Jason [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goggins, Jasona38]; Srinivasan, Sayee [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Srinivasan, Sayeeb4d]; Zaidi, Amir [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Azaiddi]; Castillo, Miguel [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Castillo, Miguel5ba]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Reinhart, Scott [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Reinhart, Scott48]
CC: Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: International Regulators Welcome Reception

This e-mail provides ethics guidance for staff who have been invited to attend the FIA Board of Directors Welcome Reception in honor of the CFTC 's International Regulators Meeting ("Reception") on March 10, 2015 and constitutes a blanket determination of agency interest in the event and approval to attend the Reception consistent with 5 C.F.R. § 2635.204(g)(3)(ii) and the advice below.

CFTC Ethics has determined that the Reception qualifies as a "widely attended gathering" as defined by 5 C.F.R. Part 2635.204(g)(2) of the Standards of Ethical Conduct for Employees of the Executive Branch (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

From: Beth Thompson [<mailto:bthompson@fia.org>]
Sent: Saturday, February 21, 2015 7:08 PM
Subject: International Regulators Welcome Reception



Beth Thompson | Executive Assistant - L&C Division Coordinator

2001 Pennsylvania Avenue NW
Suite 600 | Washington, D.C. 20006

T 202 772 3009 | F 202 296 3184
BThompson@fia.org

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/4/2015 8:24:56 PM
To: * Office of Chairman Massad [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office of Chairman Massadbed]; * Office Comm Wetjen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Wetjenb88]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; * Office Comm Giancarlo [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Giancarlof78]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Dietz, Phyllis [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=pdietz]; McGonagle, Vincent A. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=vmcgonagle]; Silberstein, Myra [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=msilberstein]; Rosenfeld, Robert H. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=rrosenfeld]; Bucsa, Daniel J. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bucsa, Daniel J.4d0]; Goggins, Jason [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goggins, Jasona38]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreyeda]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Srinivasan, Sayee [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Srinivasan, Sayeeb4d]; Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Zaidi, Amir [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Azaidi]; Castillo, Miguel [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Castillo, Miguel5ba]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Reinhart, Scott [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Reinhart, Scotttd48]
CC: Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: Invitation to International Regulators' Dinner, March 9th

This e-mail provides ethics guidance for staff who have been invited to attend the National Futures Association (“NFA”) annual dinner for International Regulators (“Dinner”) on Monday March 9, 2015 prior to the CFTC’s International Regulators Meeting (“CFTC Meeting”) on March 10, 2015, at the Boca Raton Resort and Club in Boca Raton, Florida, and constitutes a blanket determination of agency interest in the event and approval to attend the Dinner consistent with 5 C.F.R. § 2635.204(g)(3)(ii).

CFTC Ethics has determined that the Dinner qualifies as a “widely attended gathering” as defined by 5 C.F.R. Part 2635.204(g)(2) of the Standards of Ethical Conduct for Employees of the Executive Branch (b)(5)

(b)(5)

(b)(5)



If you have any questions or if we can be of any assistance, please contact either me, Heather Gottry, or William Proctor. Thank you.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/4/2015 9:19:18 PM
To: * Office of Chairman Massad [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office of Chairman Massadbed]; * Office Comm Wetjen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Wetjenb88]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; * Office Comm Giancarlo [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Giancarlof78]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Dietz, Phyllis [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=pdietz]; McGonagle, Vincent A. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=vmcgonagle]; Silberstein, Myra [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=msilberstein]; Rosenfeld, Robert H. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=rrosenfeld]; Bucsa, Daniel J. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bucsa, Daniel J.4d0]; Goggins, Jason [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goggins, Jasona38]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreyeda]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Srinivasan, Sayee [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Srinivasan, Sayeeb4d]; Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Zaidi, Amir [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Azaidi]; Castillo, Miguel [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Castillo, Miguel5ba]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Reinhart, Scott [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Reinhart, Scotttd48]
CC: Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: Katten Boca Raton Annual Dinner Invitation - Tuesday, March 10, 2015, at LUCCA

CFTC Ethics has reviewed the invitation from the Katten Muchin Rosenman (“Katten”) to Katten’s annual dinner at the FIA Boca conference, Tuesday, March 10, 2015 (“Dinner”) and this e-mail constitutes a blanket determination of agency interest in the event and approval to attend the Dinner consistent with 5 C.F.R. § 2635.204(g)(3)(ii) and the advice below.

CFTC Ethics has determined that the event qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g) of the Standards of Ethics for Employees of the Executive Branch (b)(5)

(b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

Katten
Katten Muchin Rosenman LLP

Arthur Hahn, Ken Rosenzweig, Kevin Foley, Gary DeWaal and Lance Zinman cordially invite you to Katten's annual dinner in Boca Raton, to be held at

Lucca

BOCA RATON RESORT & CLUB
501 EAST CAMINO REAL
BOCA RATON

TUESDAY, MARCH 10
7:00 PM COCKTAILS AND HORS D'OEUVRES
8:00 PM DINNER

RSVP BY MONDAY, MARCH 2
[Click here to RSVP](#)

QUESTIONS?
EMAIL CAROL LUNDIN AT CAROL.LUNDIN@KATTENLAW.COM

Attorney advertising. Published as a source of information only. The material contained herein is not to be construed as legal advice or opinion.

CONFIDENTIALITY NOTICE: This electronic mail message and any attached files contain information intended for the exclusive use of the individual or entity to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information may be subject to legal restriction or sanction. Please notify the sender, by electronic mail or telephone, of any unintended recipients and delete the original message without making any copies.

NOTIFICATION: Katten Muchin Rosenman LLP is an Illinois limited liability partnership that has elected to be governed by the Illinois Uniform Partnership Act (1997). London: Katten Muchin Rosenman UK LLP.

www.kattenlaw.com

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/4/2015 9:27:53 PM
To: * Office of Chairman Massad [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office of Chairman Massadbed]; * Office Comm Wetjen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Wetjenb88]; * Office Comm Bowen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Bowen312]; * Office Comm Giancarlo [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=* Office Comm Giancarlof78]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Dietz, Phyllis [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=pdietz]; McGonagle, Vincent A. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=vmcgonagle]; Silberstein, Myra [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=msilberstein]; Rosenfeld, Robert H. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=rrosenfeld]; Bucsa, Daniel J. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bucsa, Daniel J.4d0]; Goggins, Jason [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goggins, Jasona38]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreyeda]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Srinivasan, Sayee [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Srinivasan, Sayeeb4d]; Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Zaidi, Amir [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Azaidi]; Castillo, Miguel [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Castillo, Miguel5ba]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Reinhart, Scott [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Reinhart, Scotttd48]
CC: Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Proctor, William N [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=Proctor, William]
Subject: FW: Meet & Greet with Foreign Exchange Professionals Association

This e-mail provides ethics guidance for staff who have been invited by the Foreign Exchange Professionals Association (“FXPA”) to a meet and greet session at the Boca Conference (“Meet & Greet”) on March 10, 2015 and constitutes a blanket determination of agency interest in the event and approval to attend the Meet & Greet consistent with 5 C.F.R. § 2635.204(g)(3)(ii) and the advice below.

CFTC Ethics has determined that the Meet & Greet qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2) of the Standards of Ethical Conduct for Employees of the Executive Branch (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me or Heather Gottry, Deputy General Counsel and ADAEO. Thank you.

fxpa

Foreign Exchange
Professionals Association

Join FXPA at FIA on Tuesday, March 10,
5:30-8:30 in the Lounge beside Bar Luna

Please join the membership of the
Foreign Exchange Professionals Association
for a meet & greet session at the
FIA Boca Conference.
Representatives from the FXPA will be in
the Lounge Area adjacent to Bar Luna.



www.fxpa.org

SQUIRE
PATTON BOGGS

Matthew B. Kulkin
Senior Associate
Squire Patton Boggs (US) LLP
2550 M Street, NW
Washington, DC 20037

T +1 202 457 6056

M (b)(6)

F +1 202 457 6315

Matthew.Kulkin@squirepb.com | squirepattonboggs.com

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 9/6/2016 3:32:49 PM
To: Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]
Subject: Law360 inquiry

Petal, participation in an interview with a Law 360 reporter t

(b)(5)

(b)(5)

(b)(5)

is permissible under the ethics statues and

regulations.

(b)(5)

(b)(5)

(b)(5)

Please contact Steve Adamske regarding any possible public relation

issues. Thank you.

From: Walker, Petal
Sent: Tuesday, September 06, 2016 11:10 AM
To: Dolan, John
Subject: RE: Law360 inquiry

Sorry to be a pest. My deadline is noon ...

Petal P. Walker
Chief Counsel
Office of Commissioner Bowen
U.S. Commodity Futures Trading Commission
1155 21st St., NW
Washington, DC 20581
T: (202) 418-5794
F: (202) 418-5060
pwalker@cftc.gov

From: Walker, Petal
Sent: Tuesday, September 06, 2016 10:26 AM
To: Dolan, John
Subject: Fw: Law360 inquiry
Importance: High

Sharon needs to know by this morning.

From: Bowen, Sharon <SBowen@CFTC.gov>
Sent: Tuesday, September 6, 2016 9:50 AM
To: Walker, Petal
Cc: Slaughter, Justin
Subject: Fwd: Law360 inquiry

Can you have ethics get back to us this morning? Thanks.

From: "Jamie.Zuieback@lw.com" <Jamie.Zuieback@lw.com>
Subject: RE: Law360 inquiry

Date: 06 September 2016 09:44

To: "Bowen, Sharon" <SBowen@CFTC.gov>

Hi Sharon. Thanks for your reply. Just wanted to see whether you'd heard from your ethics folks. I think the reporter wants to talk with us today or tomorrow at the latest.

From: Bowen, Sharon [<mailto:SBowen@CFTC.gov>]

Sent: Friday, September 02, 2016 12:32 PM

To: Zuieback, Jamie (DC)

Subject: Re: Law360 inquiry

Hi Jamie. All is well and I hope you are having a good Summer. I will run this by our ethics folk. Thanks.

On: 02 September 2016 12:21, "Jamie.Zuieback@lw.com" <Jamie.Zuieback@lw.com> wrote:

Hi Sharon – I hope you are well. I write because we were contacted by a reporter for Law360 who we understand is working on a profile of you for their series about influential women in securities law. We would be happy to have someone from Latham talk with the reporter, but before we agree to do so, we wanted to check to be sure that you are participating in the story and don't have any objection. If you would prefer that we decline, we're of course happy to do so.

Many thanks.

Jamie Elise Zuieback

Public Relations Senior Manager

LATHAM & WATKINS LLP

555 Eleventh Street, NW

Suite 1000

Washington, D.C. 20004-1304

Direct Dial: +1.202.637.1081

Fax: +1.202.637.2201

Email: jamie.zuieback@lw.com

<http://www.lw.com>

This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Latham & Watkins LLP

This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

Latham & Watkins LLP

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 9/26/2016 7:48:12 PM
To: Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]
Subject: Bretton Woods Ethics for Sharon
Attachments: Fw: Invitation: Bretton Woods Committee 2016 International Council Meeting - Washington, D.C. - October 7
Importance: High

Petal - After reviewing the invitation to the Commissioner Bowen received from the Brenton Woods Committee to attend the 2016 International Council Meeting ("Brenton Woods Meeting") from May 1, 2016 to May 3, 2016 in Atlanta, Georgia, CFTC Ethics has determined that the Brenton Woods Meeting meets the definition of a "widely attended gathering" as defined by 5 C.F.R. Part 2635.204(g)(2) of the Standards of Ethical Conduct for Employees of the Executive Branch.

(b)(5)

- Commissioner Bowen may accept food and refreshments "furnished to all attendees as an integral part of the [Brenton Woods Meeting]." 5 C.F.R. § 2635.204(g)(4).
- Commissioner Bowen may not accept the gift of free attendance to, or attend, events collateral to the Brenton Woods Meeting unless she pays the cost to attend or has otherwise received clearance from CFTC Ethics to accept the gift of free attendance.
- Commissioner Bowen may not accept the gift of travel or free attendance to, or attend, events collateral to the Brenton Woods Meeting unless she pays the cost to attend or has otherwise received clearance from CFTC Ethics to accept the gifts.

If you have any questions or if we can be of any assistance, please contact either me, Heather LoPresti, or Bianca Gomez. Thank you.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 1/12/2017 8:57:43 PM
To: Goelman, Aitan [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Goelman, Aitan9c3]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Wasserman, Robert B. [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=rwasserman]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Bandman, Jeffrey [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bandman, Jeffreyeda]; Blase, Marcia K. [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=mblaze]; McGonagle, Vincent A. [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=vmcgonagle]
CC: Marcus, Jonathan L. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Marcus, Jonathan]; Brown, Karen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Brown, Karenfd6]; * Office of Chairman Massad [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office of Chairman Massadbed]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; * Office Comm Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Giancarlof78]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Biancaa49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: The American Bar Association Derivatives & Futures Law Committee Dinner ABA Dinner on January 19, 2017 in Naples, Florida

This e-mail provides ethics guidance required by 5 C.F.R. §2635.204(g)(1) for CFTC staff who have been invited to attend the American Bar Association (“ABA”) Derivatives & Futures Law Committee Dinner (“ABA Dinner”) on January 19, 2017 in Naples, Florida, and constitutes a blanket determination and authorization under 5 C.F.R. §2635.204(g)(3) for invited CFTC staff to attend the ABA Dinner. The ABA Dinner is held during the annual ABA Business Law Section’s Derivatives Law Committee ABA Meeting (“ABA Meeting”) from January 19-21, 2017. Please note that this e-mail does not provide ethics guidance on the ABA Meeting or any other invitations to events taking place in Naples, Florida during the ABA Meeting.

CFTC Ethics has determined that the ABA Dinner qualifies as a “widely attended gathering” as defined in 5 C.F.R. § 2635.204(g)(2) (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Wilkes, Wanda [<mailto:Wanda.Wilkes@wilmerhale.com>] **On Behalf Of** Berkovitz, Dan
Sent: Monday, January 04, 2016 4:29 PM
Subject: The ABA Dinner

Your response is requested:

The American Bar Association 2016 Business Law Section Derivatives & Futures Law Committee Winter Meeting invites you to:

The ABA Dinner

When: Thursday, January 21, 2016 at 8:00 p.m.

Where: North Beach Pool
LaPlaya Beach & Golf Resort
9891 Gulf Shore Drive, Naples, FL 34108
(239) 597-3123

Generously sponsored by the American Bar Association

Please RSVP by January 12, 2016

This invitation is non-transferrable and no guests, please

Wanda Wilkes | WilmerHale
Legal Secretary

1875 Pennsylvania Avenue NW
Washington, DC 20006 USA
+1 202 247 4413 (t)
+1 202 663 6363 (f)
wanda.wilkes@wilmerhale.com

Please consider the environment before printing this email.

This email message and any attachments are being sent by Wilmer Cutler Pickering Hale and Dorr LLP, are confidential, and may be privileged. If you are not the intended recipient, please notify us immediately—by replying to this message or by sending an email to postmaster@wilmerhale.com—and destroy all copies of this message and any attachments. Thank you.

For more information about WilmerHale, please visit us at <http://www.wilmerhale.com>.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/3/2017 6:03:36 PM
To: Ogilvie, Clark [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Ogilvie, Clark582]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: CME Group Congressional Reception

This e-mail provides ethics guidance for CFTC staff who have been invited by the CME Group (“CME”) to attend the CME Group’s Congressional Reception (“CME Reception”) on Wednesday, April 26, 2017 in Washington DC.

CFTC Ethics has determined that the CME Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2) (b)(5)

(b)(5)

If we inadvertently did not include other CFTC staff on this message who you know are invited to the CME Reception, please either forward this guidance on to them and copy CFTC Ethics or alternatively please ask

them to please contact CFTC Ethics directly. If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Dunham, Kionda [<mailto:Kionda.Dunham@cmegroup.com>]

Sent: Wednesday, March 22, 2017 11:50 AM

Cc: Gawkowski, Annie

Subject: CME Group Congressional Reception

Please see the attached invite to CME Group's Congressional Reception to be held on Wednesday April 26 from 5:30-7:30pm in the House Agriculture Committee Room.

Due to limited space we strongly encourage you to RSVP.

Please note this invite is non-transferable.

We look forward to seeing you there!

NOTICE: *This message, and any attachments, are for the intended recipient(s) only, may contain information that is privileged, confidential and/or proprietary and subject to important terms and conditions available at [E-Communication Disclaimer](#). If you are not the intended recipient, please delete this message. CME Group and its subsidiaries reserve the right to monitor all email communications that occur on CME Group information systems.*

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/3/2017 7:45:37 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggie3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adams, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: Invitation to the Katten Annual Dinner in Boca Raton on Tuesday, March 14 at Lucca

This e-mail provides ethics guidance for staff who have been invited to attend Katten Muchin Rosenman (“Katten”) to Katten’s Annual Dinner during the FIA Boca Conference, Tuesday, March 14, 2017 (“Dinner”). CFTC Ethics has determined that the Dinner qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2). CFTC Ethics determined that the Dinner qualifies as a widely attended event

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heath LoPresti. Thank you.

From: DeWaal, Gary [<mailto:gary.dewaal@kattenlaw.com>]
Sent: Thursday, February 16, 2017 3:48 PM
Subject: Invitation to the Katten Annual Dinner in Boca Raton on Tuesday, March 14 at Lucca

Amir:

It's that time of year again. Katten would love for you to join us at our annual dinner in Boca Raton. We're back at our historic venue, Lucca, with cocktails overlooking the harbor.

Your friends at Katten and the usual suspects very much look forward to your joining us!

Best regards,

Gary

Gary A. DeWaal
Special Counsel
Katten Muchin Rosenman LLP
575 Madison Avenue / New York, NY 10022-2585
p / (212) 940-6558 f / (212) 940-8776
gary.dewaal@kattenlaw.com / www.kattenlaw.com

Having trouble viewing this email? Click [here](#).

The graphic is a promotional flyer for the Katten Annual Dinner. It features a dark background with a photograph of a restaurant interior on the left and right sides. The text is centered and reads: "Katten" in large white letters, followed by "Katten Muchin Rosenman LLP" in smaller white letters. Below this, it says "Arthur Hahn, Lance Zinman, Kevin Foley, Chris Shannon and Gary DeWaal cordially invite you to Katten's annual dinner in Boca Raton to be held at". The name "Lucca" is written in a large, stylized yellow script. Below that, it says "BOCA RATON RESORT & CLUB" in white, followed by "501 EAST CAMINO REAL" and "BOCA RATON, FLORIDA" in yellow. The date "TUESDAY, MARCH 14" is in white, followed by "7:00 PM COCKTAILS AND HORS D'OEUVRES" and "8:00 PM DINNER" in yellow. At the bottom, it says "RSVP BY MONDAY, MARCH 6" in white.

Katten
Katten Muchin Rosenman LLP

Arthur Hahn, Lance Zinman, Kevin Foley,
Chris Shannon and Gary DeWaal cordially invite
you to Katten's annual dinner in Boca Raton
to be held at

Lucca

BOCA RATON RESORT & CLUB
501 EAST CAMINO REAL
BOCA RATON, FLORIDA

TUESDAY, MARCH 14
7:00 PM COCKTAILS AND HORS D'OEUVRES
8:00 PM DINNER

RSVP BY MONDAY, MARCH 6



Attorney advertising. Published as a source of information only. The material contained herein is not to be construed as legal advice or opinion.

CONFIDENTIALITY NOTICE: This electronic mail message and any attached files contain information intended for the exclusive use of the individual or entity to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any viewing, copying, disclosure or distribution of this information may be subject to legal restriction or sanction. Please notify the sender, by electronic mail or telephone, of any unintended recipients and delete the original message without making any copies.

Katten refers to Katten Muchin Rosenman LLP and the affiliated partnership as explained at kattenlaw.com/disclaimer.

www.kattenlaw.com

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/3/2017 7:42:04 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggie3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adams, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: FIA Board of Directors Welcome Reception in honor of the International Regulators Meeting

This e-mail provides ethics guidance for staff who have been invited to attend the FIA Board of Directors Welcome Reception (“Reception”) on March 14, 2017. CFTC Ethics has determined that the Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2). CFTC Ethics determined that the Reception qualifies as a widely attended event (b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Beth Thompson [<mailto:bthompson@fia.org>]

Sent: Thursday, February 23, 2017 11:51 AM

Subject: FIA Board of Directors Welcome Reception in honor of the International Regulators Meeting



The FIA Board of Directors invites you to the

Welcome Reception

in honor of the International Regulators Meeting

DATE

Tuesday, March 14, 2017

TIME

5:30 - 6:30 p.m.

LOCATION

The Amalfi Terrace , Boca Raton Resort & Club, Boca Raton, Florida

*Please RSVP by Monday, March 6, 2017
to bthompson@fia.org.*



**Beth Thompson | Law & Compliance Program Coordinator
and Executive Assistant**

2001 Pennsylvania Avenue NW
Suite 600 | Washington, D.C. 20006

Tel +1 202.772.3009
bthompson@fia.org

One FIA. Global Reach. Regional Expertise.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/3/2017 7:32:14 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggiecc3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adamske, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Biancaa49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: 42nd Annual FIA Boca Conference

FIA International Futures Industry Conference March 14-17, 2017

- CFTC has paid the registration fee for your attendance at FIA's 42nd Annual International Futures Industry Conference ("Conference") on March 14-17, 2017 in Boca Raton, Florida.
 - You may attend all events listed as part of the Conference agenda and you may also accept food, refreshments, entertainment, instruction and materials furnished to all attendees' participating in the Conference which includes the "DTCC Welcome Hospitality" the "Exhibitor Cocktail Hour," "the Opening Reception," "Around the World with NASDAQ" on March 14, 2017, and the "Boca Nite Out" on March 15, 2017.
 - Please note that the "FIA Boca Tennis Tournament benefiting Futures for Kids" on March 15, 2016 and the "Futures For Kids Charity Golf Tournament" on March 18, 2016 are separate and collateral events of the Conference and you will be required to pay a \$50 registration fee for the FIA Boca Tennis Tournament and the \$345 per person greens fee for the Golf Tournament if you wish to participate in those events.
- Additionally, you may accept certain, limited gifts from prohibited sources at the Conference, including a meal, that has a value of \$20 or less per single occasion, provided that the aggregate value of all gifts from a given source does not exceed \$20 per occasion or a total of \$50 within a period of one year. 5 C.F.R. § 2635.204(a). (b)(5)

(b)(5)

- You may not accept the gift of free attendance, or attend, entertainment collateral to the Conference, or meals taken other than in a group setting with all other attendees unless you pay the cost to attend or receive prior approval from the ethics office. As noted above, attendance at the "FIA Boca Tennis Tournament benefiting Futures for Kids" on March 14, 2017, and the "Futures For Kids Charity Golf Tournament" on March 16, 2017 are collateral events at the Conference and you will be required to pay the applicable fees to participate.

Communication with Former CFTC Staff at the FIA International Futures Industry Conference

(b)(5)



(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez , or Heather LoPresti. Thank you.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/8/2017 9:03:09 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggie3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adamske, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]; Danker, Richard [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d3d95def49e2405aa122d58bb3e3f9fd-Danker, Richard]; Bandman, Jeffrey [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bandman, Jeffreyeda]; Liao, Nina [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Liao, Nina384]; Devoe, Melanie [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=mdevoe]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: Meet & Greet with Foreign Exchange Professionals Association - FIA Boca Conference - March 14, 2017

This e-mail provides ethics guidance for staff who have been invited by Steptoe & Johnson LLP (“Steptoe”) on behalf of the sponsor of the event, the Foreign Exchange Professionals Association (“FXPA”), to FXPA’s reception during the FIA Boca Conference, on Wednesday, March 14, 2017 (“Reception”). CFTC Ethics has determined that the Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. §

2635.204(g)(2). (b)(5)

(b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Kulkin, Matthew <mkulkin@Step toe.com>

Sent: Wednesday, March 8, 2017 9:26 AM

To: Kulkin, Matthew

Subject: You're Invited - Meet & Greet with Foreign Exchange Professionals Association - FIA Boca Conference

Please join representatives from the [Foreign Exchange Professionals Association](#), including the newly elected officers and board of directors, for a reception during the FIA Boca Conference.

We will gather in the lounge beside Bar Luna on Tuesday, March 14 from 5:30-6:30.

The attached invitation has all of the relevant information. Please invite your friends and colleagues.

Look forward to seeing you in Florida.

Best,
Matt

Matthew B. Kulkin
Partner
mkulkin@step toe.com

Step toe

+1 202 429 6273 direct
+1 (b)(6) mobile
+1 202 429 3902 fax

Step toe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.step toe.com

This message and any attached documents contain information from the law firm Step toe & Johnson LLP that may be confidential and/or privileged. If you are not the intended recipient, please do not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 4/3/2017 6:08:55 PM
To: Blase, Marcia K. [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=mbblaze]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Ogilvie, Clark [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Ogilvie, Clark582]; Claussen, Cory [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Claussen, Coryd01]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Driscoll, Katherine [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=kscovin]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Berdansky, Rachel [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=rberdansky]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggiea3]; Duffy, Lee Ann [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=lduffy]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Biancaa49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: SIFMA Board of Directors for a Reception on Monday, April 24, 2017

This e-mail provides ethics guidance for CFTC staff who have been invited by the Securities Industry and Financial Markets Association ("SIFMA") to attend the SIFMA Board of Directors Reception ("SIFMA Reception") on Monday, April 24, 2017, in Washington DC.

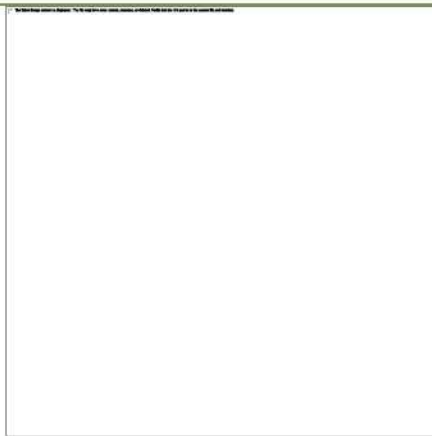
CFTC Ethics has determined that the SIFMA Reception qualifies as a "widely attended gathering" as defined by 5 C.F.R. § 2635.204(g)(2) (b)(5)

(b)(5)

If we inadvertently did not include other CFTC staff on this message who you know are invited to the SIFMA Reception, please either forward this guidance on to them and copy CFTC Ethics or alternatively please ask them to please contact CFTC Ethics directly. If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Ken Bentsen [<mailto:ken.bentsen@sifma.org>]
Sent: Tuesday, March 21, 2017 12:01 PM
Subject: Please Join the SIFMA Board of Directors for a Reception

April 24, 6:30pm at the Hirshhorn Museum and Sculpture Garden
Having trouble reading this email? View it on our [website](#).



SIFMA and our Board of Directors invite you to join us for a reception at the Hirshhorn Museum and Sculpture Garden. Throughout the evening, guests will have the opportunity to tour the new Yayoi Kusama: Infinity Mirrors exhibit.

Monday, April 24, 2017 | 6:30pm
Hirshhorn Museum and Sculpture Garden
Independence Ave, SW, Washington, DC 20024



VALET PARKING AVAILABLE |
NON TRANSFERABLE

SIFMA seeks to comply with all regulations concerning the entertainment of public officials and employees. This event is intended to comply with the reception exception of the congressional gift rules. Executive branch employees should consult with their designated agency ethics officer to determine whether they may attend the event. Written approvals may be sent to [Elsa Hoffacker](#). Alternatively, if you wish to pay the cost of food and beverages, please contact [Elsa Hoffacker](#) to make necessary arrangements.

120 Broadway, 35th Floor, New York, NY 10271 | [212.313.1000](tel:212.313.1000)
1101 New York Avenue NW, 8th Floor, Washington, DC 20005 | [202.962.7300](tel:202.962.7300)
www.sifma.org



[Unsubscribe](#) from this mailing.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/6/2017 3:18:42 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggie3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adams, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: IHS Markit Welcome Reception March 14, 2017

This e-mail provides ethics guidance for staff who have been invited to attend the IHS Markit Welcome Reception during the FIA’s 42nd Annual International Futures Industry Conference (“Welcome Reception”) on March 14, 2017. CFTC Ethics has determined that the Welcome Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2). (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heath LoPresti. Thank you.

From: Markit [<mailto:events@announcements.markit.com>]

Sent: Wednesday, February 15, 2017 10:20 AM

To: Zaidi, Amir

Subject: IHS Markit Welcome Reception

Email not displaying correctly? [View it in your browser](#)



Invitation

IHS Markit Welcome Reception

Boca Raton | Tuesday, March 14th, 2017

We welcome you to Boca and invite to join us for cocktails and hors d'oeuvres. Meet and mingle with a diverse group of industry professionals.

Our leadership team looks forward to meeting you and introducing you to the new IHS Markit.

Event details

WHERE

**The Terrace at 501 East Kitchen
and Bar**

Boca Raton Resort & Club
[501 East Camino Real](#)
[Boca Raton, FL, 33432](#)

WHEN

Tuesday, March 14th

7.30 - 9.30 pm

*This will be a widely attended event.

REGISTER

Copyright © 2016 Markit Group Limited. All rights reserved.

[PRIVACY POLICY](#) | [TERMS OF USE](#) | [DISCLAIMER](#) | [CONTACT US](#)

[Unsubscribe from this communication.](#)

Markit Group Limited is registered and incorporated in England & Wales (company number: 04185146).

Registered office: 4th floor Ropemaker Place, 25 Ropemaker Street, London EC2Y 9LY.

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/3/2017 8:24:30 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggiecc3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adams, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Biancaa49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: NFA International Regulators Dinner in Boca
Attachments: NFA Dinner Invitation Boca 2017.docx

This e-mail provides ethics guidance for invited staff who have been invited to attend the National Futures Association's ("NFA") International Regulators annual dinner ("NFA dinner") on March 13, 2017, in Boca Raton, Florida. CFTC Ethics has determined that the NFA dinner qualifies as a "widely attended gathering" defined by 5 C.F.R. § 2635.204(g)(2). (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Karen Wuertz [<mailto:KWuertz@NFA.Futures.Org>]

Sent: Monday, February 27, 2017 3:27 PM

Subject: International Regulators Dinner in Boca

Good Afternoon,

Attached you will find an invitation to the International Regulators' dinner in Boca. Please open the invitation and respond accordingly. Looking forward to seeing you in Boca.

Thanks,
Karen

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/3/2017 7:56:44 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggie3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adamske, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: Jane Gladstone (Evercore) dinner invitation on March 15, 2017

This e-mail provides ethics guidance for individuals who have been invited by Jane Gladstone to attend Evercore's ("Evercore") annual museum tour, cocktail reception and dinner ("Evercore Event") during the FIA's International Futures Industry Conference in Boca Raton, Florida on March 15, 2017. CFTC Ethics has determined that the Evercore Event qualifies as a "widely attended gathering" as defined by 5 C.F.R. § 2635.204(g)(2)(b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you

From: Gladstone, Jane [<mailto:gladstone@evercore.com>]
Sent: Tuesday, January 10, 2017 5:10 PM
To: GladstoneOffice
Subject: Boca

**Jane Gladstone would like to invite you to dinner at the
Boca Raton Museum of Art
501 Plaza Real
Mizner Park
Boca Raton, FL 33432**

Date: Wednesday, March 15, 2017

Time: 6:30 PM Private Guided Tour

7:00 PM Hors D'oeuvres Followed by Dinner

**A brief private tour of the Museum will be followed by cocktails and dinner in the
Museum's Sculpture Gardens and Grand Hall**

**Transportation will be provided to and from The Boca Raton Resort
& Club and the Museum. Please meet at the West Lawn at 6:15 PM**

**This Invitation is Not Transferable
and we regret that we cannot accommodate additional attendees**

Space is limited

Please RSVP as soon as you can to my assistant at:

gladstoneoffice@evercore.com

or (212) 822-7521

The Museum is Featuring Salvatore Meo:

Salvatore Meo and the Poetics of Assemblage

January 31 – July 2, 2017

Under-recognized in American art history, Salvatore Meo was a pioneer of assemblage art during the mid-20th century. His mixed-media works—largely composed of discarded items found on the street—were a forerunner to the Arte Povera movement. The scraps Meo used in his work included items such as the grubby head of a doll, a shoe heel, string, and rusted wire, which acted as lyrical evocations of decay and abandonment. As an “artist’s artist” and equally important a “critic’s artist,” his impact was deeply felt by such artists as Robert Rauschenberg, Cy Twombly, and many others. Born in South Philadelphia of Italian parents in 1914, by 1951 Meo was a permanent resident in Rome. This exhibition draws key works from his studio, located directly behind the Trevi fountain, which has been preserved in its original state since the artist’s death in 2004.

Jane R. Gladstone
Senior Managing Director
Evercore Partners
55 East 52nd Street, 38th floor
New York, NY. 10055
Phone: 212-857-3169
Mobile: (b)(6)
gladstone@evercore.com

The information contained in this email message is intended only for use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please immediately notify us by email, and destroy the original message.
Thank you

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 3/3/2017 7:48:16 PM
To: Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Piccoli, Kevin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Piccoli, Kevincc5]; Sklar, Maggie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Sklar, Maggie3]; Slaughter, Justin [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Slaughter, Justin0f6]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Bucsa, Daniel J. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bucsa, Daniel J.4d0]; Adams, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Walker, Petal [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Walker, Petal7ec]; Jones, Shonneice [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sknight]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Bianca49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: DTCC FIA Boca Reception - Wednesday, March 15, 2017

This e-mail provides ethics guidance for staff who have been invited to attend the Depository Trust & Clearing Corporation (“DTCC”)’s reception, Wednesday, March 15, 2017 (“DTCC Reception”) during the FIA’s 42nd Annual International Futures Industry Conference. CFTC Ethics has determined that the DTCC Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2). (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heath LoPresti. Thank you.

From: DTCC [<mailto:cdorsett@dtcc.com>]
Sent: Friday, February 17, 2017 9:56 AM
Subject: Join DTCC at FIA Boca for a Reception - Wednesday, March 15, 2017 @ Lucca's El Lago Patio

Please click [Yes](#) or [No](#) to accept/decline by March 9, 2017.



Join DTCC at FIA Boca 2017

**WE ARE DELIGHTED TO INVITE YOU TO
JOIN DTCC's PRESIDENT & CEO MIKE BODSON
AND OUR EXECUTIVE TEAM FOR AN
OUTDOOR RECEPTION**

WHEN
Wednesday, March 15, 2017
4:30 PM – 6:30 PM

WHERE
Lucca's El Lago Patio
Boca Raton Resort

RSVP by
Thursday, March 9, 2017

We look forward to welcoming you!

DTCC
Securing Today. Shaping Tomorrow.®

Thank you

Having trouble with the link? Simply copy and
paste the entire address listed below into your
web browser:
<http://www.cvent.com/d/2sN0KrHMsUa7rkEn26wl-w/3j6k/P1/1Q?>

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 5/2/2017 3:09:22 PM
To: Thornton, Charlie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2f7cd1b27f3e4fde80a5088eadd3b931-Thornton III, Norwo]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Ogilvie, Clark [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Ogilvie, Clark582]; Wasserman, Robert B. [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=rwasserman]
CC: * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; McDonald, James [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9d89e804eca744bc82026c05480a124f-McDonald, James]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Gottry, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gottry, Heather27e]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather0]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Biancaa49]
Subject: NFA Reception Invitation

This e-mail provides ethics guidance for staff who have been invited to attend the National Futures Association (“NFA ”)’s Washington Reception on Monday, May 8, 2017 (“NFA Reception”) in Washington, D.C. CFTC Ethics has determined that the NFA Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2). (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you.

From: Karen Wuertz [<mailto:KWuertz@NFA.Futures.Org>]

Sent: Tuesday, April 11, 2017 12:31 PM

Subject: NFA Reception Invitation

Please see the attached invitation to NFA's Washington Reception to be held on Thursday May 18 from 5:30-7:30pm in the House Agriculture Committee Room.

Due to limited space we strongly encourage you to RSVP.

Please note this invitation is non-transferable.

We look forward to seeing you there!

Thanks,
Karen

Message

From: Slaughter, Justin [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SLAUGHTER, JUSTIN0F6]
Sent: 5/10/2017 8:58:27 PM
To: Dolan, John [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=jdolan]
CC: Bowen, Sharon [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Bowen, Sharon0cf]; Thompson, Anthony C. [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Thompson, Anthony C.]
Subject: Recusal

John,

I hereby recuse myself, effective immediately, from all Commission business. My last day at the Commission will be

(b)(6) Please reach out to me with any questions.

Sincerely,
Justin

Justin Slaughter
Chief Policy Adviser & Special Counsel
Office of Commissioner Bowen
202-418-5213

Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 6/20/2017 6:00:35 PM
To: Thornton, Charlie [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2f7cd1b27f3e4fde80a5088eadd3b931-Thornton III, Norwo]; Pan, Eric [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Pan, Eric9a2]; Adamske, Steven [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Adamske, Steven]
CC: Davis, Daniel J [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=77dff82dcb344436bd3e30fc3d740dde-Davis, Daniel J]; Gill, Michael [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3ab6b606c58b45fe8b9174d248b3fa65-Gill, Michael]; * Office Chairman Giancarlo [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Giancarlof78]; * Office Comm Bowen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=* Office Comm Bowen312]; Flaherty, Eileen [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Flaherty, Eileen26f]; Richardson, Erica Elliott [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=90deca0aceef45b393696dcc2f94f83a-Richardson, Erica]; McDonald, James [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=9d89e804eca744bc82026c05480a124f-McDonald, James]; Lawton, John C. [/o=CFTC/ou=Washington, DC/cn=Recipients/cn=jlawton]; Srinivasan, Sayee [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Srinivasan, Sayeeb4d]; Zaidi, Amir [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=azaidi]; Gomez, Bianca [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=Gomez, Biancaa49]; LoPresti, Heather [/o=CFTC/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=LoPresti, Heather015]
Subject: FIA Reception on Tuesday, July 11, 2017 in Washington DC

This e-mail provides ethics guidance for CFTC staff who have been invited by the Futures Industry Association (“FIA”) to attend the FIA’s Reception on Tuesday, July 11, 2017 in Washington D.C.

CFTC Ethics has determined that the FIA Reception qualifies as a “widely attended gathering” as defined by 5 C.F.R. § 2635.204(g)(2)(b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Bianca Gomez, or Heather LoPresti. Thank you

From: "FIA" <paperlesspost@paperlesspost.com>

Subject: FIA Reception

Date: 17 June 2017 18:37



Add Paperless Post to your address book to receive all cards and invitations from FIA on time.

The delivery of this email may have been delayed due to spam blocking settings.

For: epan@cftc.gov

WILL ATTEND

WILL NOT ATTEND



Walt Lukken and the
FIA Board of Directors
Invite you to a

Reception

on Tuesday, July 11
from 5:30 p.m. to 7:30 p.m.
at the Agriculture Committee Room

1300 Longworth House Office Building, Washington, D.C.
*(Guests should use the front Longworth entrance
on Independence Avenue, SE)*

Kindly RSVP by July 3.

This invitation is non-transferable.
This is a widely attended event and includes invited
guests from the financial services industry.

FIA RECEPTION

Tuesday, July 11th from 5:30 PM to 7:30 PM

Agriculture Committee Room

1300 Longworth House Office Building

[View the card](#)

[View map](#) Add to Calendar: [Google](#), [Outlook](#), [iCal](#), or [Yahoo](#)

Access event on the go: [Get the iPad and iPhone app](#)

For the best Paperless Post experience, add paperlesspost@paperlesspost.com to your address book to ensure you receive all cards and invitations in your inbox. [Block this person](#) from sending you Paperless Post mail. [Click here](#) to stop receiving emails from Paperless Post including invitations and cards. [Learn more about our privacy policy.](#)



© Paperless Post • 115 Broadway, New York, NY 10006

Message

From: Bowen, Sharon [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BOWEN, SHARON0CF]
Sent: 1/15/2015 4:48:32 PM
To: Dolan, John [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=jdolan]
Subject: RE: ABA Dinner

I do plan to attend the dinner. Thanks.

From: Dolan, John
Sent: Thursday, January 15, 2015 11:10 AM
To: Bowen, Sharon; Giancarlo, Chris; Goelman, Aitan; Lowe, Gretchen L.; Remmler, Erik F; McGonagle, Vincent A.; Ehrman, Christopher; Wasserman, Robert B.; Walker, Petal; Goggins, Jason
Cc: Marcus, Jonathan L.; Gottry, Heather; Blase, Marcia K.
Subject: FW: ABA Dinner

This e-mail provides ethics guidance for staff who have been invited to attend the ABA 2015 Derivatives & Futures Law Committee Dinner (“Dinner”) on January 22, 2015 in Naples, Florida during the annual American Bar Association (“ABA”) Business Law Section’s Derivatives Law Committee Meeting (“Meeting”) from January 22-24, 2015, and constitutes a blanket determination of agency interest in the event and approval to attend the Dinner consistent with 5 C.F.R. § 2635.204(g)(3)(ii).

CFTC Ethics has determined that the Dinner qualifies as a “widely attended gathering” as defined by 5 C.F.R. Part 2635.204(g)(2) of the Standards of Ethical Conduct for Employees of the Executive Branch (b)(5)

(b)(5)

If you have any questions or if we can be of any assistance, please contact either me, Heather Gottry, or William Proctor. Thank you.

From: Berkovitz, Dan [<mailto:Dan.Berkovitz@wilmerhale.com>]
Sent: Monday, January 05, 2015 4:04 PM
To: Dolan, John
Subject: ABA Dinner

John—

Attached please find the list of confirmed attendees at the ABA Dinner on January 22, 2015, at the ABA Derivatives & Futures Law Committee meeting. We have 33 confirmed private sector attendees so far, from a variety of organizations and representing a wide variety of viewpoints. In addition, we would like to invite the CFTC and non-CFTC conference speakers to this dinner. The ABA would like to host the CFTC speakers at the dinner. The tentative invite list is attached.

Please let me know if you have any additional questions.

Thanks again for your consideration of this matter,

Best regards,

Dan

Dan M. Berkovitz | WilmerHale

1875 Pennsylvania Avenue NW

Washington, DC 20006 USA

+1 202 663 6352 (t)

+1 202 663 6363 (f)

dan.berkovitz@wilmerhale.com

Please consider the environment before printing this email.

This email message and any attachments are being sent by Wilmer Cutler Pickering Hale and Dorr LLP, are confidential, and may be privileged. If you are not the intended recipient, please notify us immediately—by replying to this message or by sending an email to postmaster@wilmerhale.com—and destroy all copies of this message and any attachments. Thank you.

For more information about WilmerHale, please visit us at <http://www.wilmerhale.com>.

Message

From: Charley, Willie [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CHARLEY, WILLIE4A4]
Sent: 3/27/2015 1:46:08 PM
To: Adamske, Steven [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Adamske, Steven]; Allen, Natise [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=nstowe]; Astrada, Laura [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Mastrada]; Bandman, Jeffrey [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bandman, Jeffreyeda]; Barrett, Danielle [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Barrett, Daniellec4b]; Bowen, Sharon [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bowen, Sharon0cf]; Brown, Karen [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Brown, Karenfd6]; Charley, Willie [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Charley, Willie4a4]; Claussen, Cory [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Claussen, Coryd01]; Dolan, John [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=jdolan]; Faulk-White, Donna [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Faulk-White, Donna0e9]; Goelman, Aitan [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Goelman, Aitan9c3]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]; Griffin, Ward P [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wgriffin]; Holden, Dennis W. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=dholden]; Josephson, Sarah E [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=sjosephson]; Jurgens, Melissa [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Jurgens, Melissae8]; Juzenas, Eric [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=wjuzenas]; Kirkpatrick, Chris [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Kirkpatrick, Chris8f]; Lavik, A. Roy [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=alavik]; Marcus, Jonathan L. [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Marcus, Jonathan]; Massad, Timothy [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Massad, Timothyc4e]; Ogilvie, Clark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Ogilvie, Clark582]; Reinhart, Scott [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Reinhart, Scottd48]; Scott, Gail B. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=gscott]; Sidman, Robert [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Sidman, Robertf7c]; Sklar, Maggie [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Sklar, Maggiea3]; Slaughter, Justin [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Slaughter, Justin0f6]; Smith, Chanel [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=csmith]; Stewart, Lawranne [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Stewart, Lawrannedfc]; Turner, Antoinette [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=amccoy]; Walker, Petal [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Walker, Petal7ec]; Wetjen, Mark [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Wetjen, Mark23d]; Wilson, Vontrece [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Williams, Vontrece]; Woodland, Michelle D. [/O=CFTC/OU=Washington, DC/cn=Recipients/cn=mwoodland]; Wright, Ann [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Wright, Ann830]
Subject: NEW - ABSENT OBJECTION 2015052: No-Action Letter on error trade for cleared swaps - WMBAA | OBJECTIONS D MONDAY, APRIL 13TH @ 10:00 AM

Please note, Commissioner Giancarlo is recused from the review of this letter.

Please use the link provided below to visit the Secretariat's SharePoint site to view **ABSENT OBJECTION 2015052: No-Action Letter on error trade for cleared swaps - WMBAA**.

The deadline for objections is **Monday, April 13, 2015 @ 10:00 a.m.**

DMO/DCR intends to issue this letter, absent an objection by a majority of the Commission, once the response deadline has passed.

To view the document presented for absent objection review: [Please CLICK HERE.](#)

To see the list of all documents currently open for absent objection review: [Please CLICK HERE.](#)

Questions about this matter may be directed to Nancy Markowitz (x5453) in DMO.

Thank you.

**The Secretariat
Office of the Executive Director
U.S. Commodity Futures Trading Commission**



Message

From: Dolan, John [/O=CFTC/OU=WASHINGTON, DC/CN=RECIPIENTS/CN=JDOLAN]
Sent: 5/4/2015 2:39:39 PM
To: Slaughter, Justin [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Slaughter, Justin0f6]
CC: Bowen, Sharon [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Bowen, Sharon0cf]; Gottry, Heather [/O=CFTC/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=Gottry, Heather27e]
Subject: RE: Compliance Letter from Managed Funds Association

Yes I should have added that.

From: Slaughter, Justin
Sent: Monday, May 04, 2015 10:39 AM
To: Dolan, John
Cc: Bowen, Sharon; Gottry, Heather
Subject: Re: Compliance Letter from Managed Funds Association

Great - so, just to be clear, Commissioner Bowen can sign it?

From: Dolan, John
Sent: Monday, May 04, 2015 10:37 AM
To: Slaughter, Justin
Cc: Bowen, Sharon; Gottry, Heather
Subject: RE: Compliance Letter from Managed Funds Association

Justin, we did a final review of the Managed Funds Association (MFA)'s Conference Presenter Release Form attached to the February 18, 2015 Letter to Commissioner Bowen. (b)(5)

(b)(5)
(b)(5) Please

let me know if you have any questions or would like to discuss further. Thank you.

From: Slaughter, Justin
Sent: Thursday, April 30, 2015 10:21 AM
To: Dolan, John
Cc: Bowen, Sharon
Subject: FW: Compliance Letter from Managed Funds Association

Hey John,

(b)(5)
(b)(5) Please confirm that Commissioner Bowen can sign this – deadline is ASAP since she is speaking there Tuesday.

Best,
Justin

From: Holland, Rachael [<mailto:rholland@managedfunds.org>]
Sent: Thursday, April 30, 2015 10:17 AM
To: Slaughter, Justin
Cc: Harlow, Brooke; Allensworth, Benjamin
Subject: Compliance Letter from Managed Funds Association

Justin,

If Commissioner Bowen is just attending her panel, then we don't need her to complete the gift confirmation letter, but we will need her to return the attached speaker agreement.

Let me know if she plans attending other sessions and I can revise the gift letter. Thank you so much for your help!

Regards,
Brooke

From: Harlow, Brooke
Sent: Thursday, April 16, 2015 12:37 PM
To: JSlaughter@CFTC.gov
Cc: Holland, Rachael; Allensworth, Benjamin
Subject: Compliance Letter from Managed Funds Association

Justin,

I am pleased to invite CFTC Commissioner Sharon Bowen on behalf of your organization to attend the Compliance 2015 conference in New York City on May 5th as a speaker. Managed Funds Association is committed to making this event a valuable educational experience. As in prior years, the gathering will be conducted for valid business purposes. The enclosed agenda for the conference describes the educational aspects of the conference. Your representative's meals and registration expenses are provided to the CFTC compliments of MFA. We have attached, for your convenience, a template acceptance form which your agency can use to confirm that MFA may pay for (or reimburse) the above expenses.

MFA seeks to comply with state and local regulations concerning the entertainment of public officials and employees. To the extent that your representative is required by the rules and regulations or the policy of your department, agency, or authority to personally reimburse MFA for the meals relating to attending this event, we will, of course, be happy to assist with direct payment arrangements.

Please either confirm a CFTC representative's attendance or notify us that your organization will not be able to join us. Please also complete the template acceptance form (or similar form) confirming the agency's acceptance of MFA's offer to pay or reimburse expenses, or notifying us if your agency or representative are unable to accept payment by reimbursement from MFA.

Regards,
Brooke

D. Brooke Harlow
Executive Vice President and Managing Director
Managed Funds Association
546 Fifth Avenue, 12th Floor
New York, N.Y. 10036
(212) 542 8463
bharlow@managedfunds.org