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CFTC Client Alert: Proposed Amendment to RTO/ISO Exemption

May 13, 2016 | *Lisa G. Dowden*

The CFTC recently issued a proposal to amend a 2013 order that exempts certain transactions in certain ISOs and RTOs from most provisions of the CEA. The amendment would state that the 2013 order does *not* exempt entities from the private right of action found in section 22 of the CEA with respect to the substantive provisions of the CEA that are not covered by that order (primarily fraud and manipulation). The proposal is scheduled to be published in the *Federal Register* this coming Monday, May 16; comments on the proposal will therefore be due June 15. Please contact us with any questions.

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