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Client Alert: CFTC Final Rule Eliminates Trade Options Reporting on Form TO

March 21, 2016 | *Lisa G. Dowden*

The Commodity Futures Trading Commission ("CFTC") recently issued a final rule that provides meaningful relief for those of you who engage in trade options (or suspected trade options) in the course of business. The final rule eliminates the requirement that entities that are not Swap Dealers or Major Swap Participants file an annual Form TO disclosing otherwise-unreported trade options. The rule also provides relief from certain other recordkeeping and reporting requirements related to trade options. The final rule is effective today, March 21. For your convenience, the attached memorandum briefly summarizes key points from this rule.

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