

Regulatory Circular RG15-052

Date: March 30, 2015

To: Trading Permit Holders
From: Market Services Department

RE: Restrictions on Transactions in Life Partners Holdings Inc. (LPHI)

Effective March 30, 2015, Life Partners Holdings Inc. (LPHI) was delisted from the NASDAQ and moved its listing to the Other-OTC market under the symbol LPHIQ. The LPHI option symbol will remain the same for one day and change to LPHIQ effective for Tuesday, March 31, 2015. Therefore, trading in LPHI options on March 30, 2015 and trading in LPHIQ options commencing on March 31, 2015 will be subject to restrictions.

Trading on CBOE in existing series of LPHI/LPHIQ options will be subject to the following restrictions. Only closing transactions may be affected in any series LPHI/LPHIQ options except for (i) opening transactions by Market-Makers executed to accommodate closing transactions of other market participants and (ii) opening transactions by CBOE TPH organizations to facilitate the closing transactions of public customers executed as crosses pursuant to and in accordance with CBOE Rule 6.74(b) or (d).

The execution of opening transactions in LPHI/LPHIQ options, except as permitted above, and/or the misrepresentation as to whether an order is opening or closing, will constitute a violation of CBOE rules, and may result in disciplinary action. TPH organizations should ensure that they have appropriate procedures in place to prevent their customers from entering opening orders in this restricted option class. In addition, transactions in contravention of this restriction may be subject to nullification pursuant to Exchange Rule 6.25.

There are no restrictions in place with respect to the exercise of LPHI/LPHIQ options.

In addition, effective March 30, 2015 the Automated Improvement Mechanism (AIM) will be deactivated in all series of (LPHI/LPHIQ) options. Any reactivation of AIM in this option class in the future will be announced via Regulatory Circular.

Any questions regarding this circular may be directed to the Market Services Department at marketservices@cboe.com and (312) 786-7950 or the Regulatory Interpretations and Guidance team at RegInterps@cboe.com and by telephone at (312) 786-8141.

CBOE restricted class memos can be accessed from CBOE.org at the following web address: http://www.cboe.org/Restrictions