CBOE Regulatory Circular RG16-168
C2 Regulatory Circular RG16-057

Date: **October 28, 2016**

To: **CBOE, C2 Trading Permit Holders**

From: **Market Operations Department**

RE: **Restrictions on Transactions in Violin Memory, Inc. (VMEM & adj. VMEM1)**

Effective October 28, 2016, Violin Memory (VMEM & adj. VMEM1) was delisted from the NYSE and moved its listing to the Other-OTC Market under the symbol VMEM. Therefore, trading in VMEM & adj. VMEM1 options will be subject to restrictions.

Trading on CBOE in existing series of VMEM & adj. VMEM1 options will be subject to the following restrictions. Only closing transactions may be affected in any series VMEM & adj. VMEM1 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).

Trading on C2 in existing series of VMEM & adj. VMEM1 options will be subject to the following restrictions. Only closing transactions may be affected in any series of VMEM & adj. VMEM1 options except for opening transactions by Market-Makers executed to accommodate closing transactions of other market participants.

The execution of opening transactions in VMEM & adj. VMEM1 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 CBOE Rule 6.25 or C2 Rule 6.15.

There are no restrictions in place with respect to the exercise of VMEM & adj. VMEM1 options.

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

CBOE and C2 restricted class memos can be accessed from CBOE.org at the following web address: http://www.cboe.org/Restrictions.