



EDGA & EDGX STOCK EXCHANGES			
Regulatory Information Circular			
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Subject: Safety First Trust Series Principal Protected Certificates

Information on the Notes

The EDGA and EDGX Exchanges will begin trading, Safety First Trust Series 2008-1 Principal-Protected Certificates linked to a U.S.-Europe-Japan Basket. The Index Basket includes the S&P 500 Index (SPX), the Dow Jones EURO STOXX 50 Index (SX5E), and the Nikkei 225 Index (NKY). The new securities were issued at \$10 each with a maturity date of March 6, 2014. The Certificates are guaranteed by the creditworthiness of Citigroup Funding Inc.

At maturity for each Certificate, investors will receive the sum of (i) \$10.00 plus (ii) a Supplemental Distribution Amount calculated as follows:

- i. If the Final Index Basket Level is greater than the Starting Index Basket Level, the Supplemental Distribution Amount will equal the product of (i) \$10.00, (ii) the Index Basket Return Percentage
- ii. Otherwise the Supplemental Distribution Amount will equal zero.

The Index Basket Return Percentage is:

$$\frac{\text{Final Index Basket Level} - \text{Starting Index Basket Level}}{\text{Starting Index Basket Level}}$$

The Starting Basket Level equals: 100.00

The notes are a series of unsecured debt issued by Safety First Trust and will be issued in book entry form. The Trustee for the securities is *The Bank of New York*.

The market value of ATA will depend substantially on the value of the underlying indices. Other factors that will likely affect the trading value of ATA are changes in interest rates, volatility of the indices, time remaining to maturity, and the credit rating of the issuer.

Contact your Tax Advisor for information concerning taxation.

Exchange Rules Applicable to Trading in the Notes

The Notes are considered equity securities, thus rendering trading in the Notes subject to the Exchange's existing rules governing the trading of equity securities.

Trading Hours

Trading in the shares on EDGA and EDGX Exchanges (the “Exchanges”) is on a UTP basis and is subject to the Exchanges equity trading rules. The shares will trade from 8:00 a.m. until 8:00 p.m. Eastern Time. Members trading the shares during the Extended Market Sessions (Pre-opening and Post-closing sessions) are exposed to the risk of the lack of the calculation or dissemination of underlying index value or intraday indicative value (“IIV”). For certain derivative securities products, an updated underlying index value or IIV may not be calculated or publicly disseminated in the Extended Market hours. Since the underlying index value and IIV are not calculated or widely disseminated during Extended Market hours, an investor who is unable to calculate implied values for certain derivative securities products during Extended Market hours may be at a disadvantage to market professionals.

Suitability

Trading in the Shares on the Exchanges will be subject to the provisions of EDGA and EDGX Exchange Rules 3.7. Members recommending transactions in the Shares to customers should make a determination that the recommendation is suitable for the customer. In addition, members must possess sufficient information to satisfy the “know your customer” obligation that is embedded in Exchange Rules 3.7.

Members also should review FINRA Notice to Members 03-71 for guidance on trading these products. The Notice reminds members of their obligations to: (1) conduct adequate due diligence to understand the features of the product; (2) perform a reasonable-basis suitability analysis; (3) perform customer-specific suitability analysis in connection with any recommended transactions; (4) provide a balanced disclosure of both the risks and rewards associated with the particular product, especially when selling to retail investors; (5) implement appropriate internal controls; and (6) train registered persons regarding the features, risk and suitability of these products.

Trading Halts

The Exchanges will halt trading in the Shares of a Trust in accordance with Exchange Rules 14.1(c)(4). The grounds for a halt under this Rule include a halt by the primary market because it stops trading the Shares and/or a halt because dissemination of the IIV or applicable currency spot price has ceased, or a halt for other regulatory reasons. In addition, the Exchanges will stop trading the Shares of a Trust if the primary market de-lists the Shares.

This Regulatory Information Circular is not a statutory Prospectus. Members should consult the Trust’s Registration Statement, SAI, Prospectus and the Fund’s website for relevant information.

Appendix A

Ticker	Fund Name	Cusip
ATA	Safety First Trust Series 2008-1 Principal-Protected Certificates linked to a U.S.-Europe-Japan Basket	78647M106