



BZX Regulatory Circular 19-003
BYX Regulatory Circular 19-003

EDGA Regulatory Circular 19-003
EDGX Regulatory Circular 19-003

Date: January 11, 2019

To: Members

From: Regulatory Division

RE: Anti-Money Laundering Compliance Program and
Customer Due Diligence Requirements

Customer Due Diligence Requirements

Please note, the Financial Crimes Enforcement Network (“FinCEN”) adopted a final rule on Customer Due Diligence Requirements for Financial Institutions (“CDD Rule”), which became effective July 11, 2016. Members to whom the rule applies must be in compliance with the provisions of the CDD Rule by May 11, 2018. See the following for more information: [FinCEN Guidance FIN-2018-G001](#) (April 3, 2018); [FINRA Regulatory Notice 17-40](#); [81 FR 29397 \(May 11, 2016\)](#); and [82 FR 45182 \(September 28, 2017\)](#).

AML Compliance Program Generally

As a reminder, in accordance with BZX, BYX, EDGA, and EDGX Rules 5.6, *Anti-Money Laundering Compliance Program*, each Member shall develop and implement an anti-money laundering program reasonably designed to achieve and monitor compliance with the requirements of the Bank Secrecy Act, and the implementing regulations promulgated thereunder by the Department of Treasury. Please refer to Rule 5.6 for additional information on AML program requirements.

In the event that any of the provisions of Rule 5.6 conflict with any of the provisions of another applicable self-regulatory organization’s rule requiring the development and implementation of an AML compliance program, the provisions of the rule of the Member’s Designated Examining Authority shall apply.

Additional Information

Any questions regarding this Regulatory Circular may be referred to Regulatory Interpretations at RegInterps@cboe.com or 312-786-8141.