



**Regulatory Circular RG07-05**

**DATE:** January 9, 2007

**FROM:** Market Operations Department

**RE:** Restrictions on Transactions in  
Escala Group, Inc. (ESCL/UGL)

The NASD has suspended trading in shares of Escala Group, Inc. (ESCL/UGL), on the opening of business on January 10, 2007.

Trading on the CBOE in existing series of UGL options is subject to the following restrictions. Only closing transactions may be affected in any series of UGL options except for (i) opening transactions by market makers executed to accommodate closing transactions of other market participants and (ii) opening transactions by CBOE member 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 UGL 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. Member organizations should ensure that they have appropriate procedures in place to prevent their customers from entering opening orders in this restricted option class.

There are no restrictions in place with respect to the exercise of UGL options. The provisions of this circular apply to any options on UGL traded on CBOE.

Any questions regarding this circular may directed to Kerry Winters at (312) 786-7312 or Joanne Heenan-Hustad at (312) 786-7786.

CBOE restricted class memos can be accessed from CBOE.org at the following web address:

<http://www.cboe.org/Restrictions>