

CBOE/C2 FORM OE-418

To be completed and retained by all individual TPHs and each nominee/"registered for" of TPH organizations using this form to comply with CBOE/C2 Rule 4.18. Please read instructions before completing this form.

1. REPORTING TPH (Name/Acronym):	2. PERIOD COVERED BY THIS FORM (Calendar Year):
3. TYPE OF ORGANIZATION (e.g., sole proprietor, partnership, corporation):	
4. FILING AS (Check one): a. <input type="checkbox"/> INDIVIDUAL TPH b. <input type="checkbox"/> SENIOR REPORTING PERSON FILING ON BEHALF OF A TPH ORGANIZATION* c. <input type="checkbox"/> NON-SENIOR REPORTING PERSON, NOMINEE/REGISTERED FOR OF TPH ORGANIZATION *If you checked 4b above, please list below (type or print) the name(s) and acronym(s) of the employees who are "registered for" or nominees of the TPH organization and the name(s) of the employee(s) on whose behalf you are filing (attach a separate sheet listing such individuals, if necessary): _____ _____ _____	
5. IF ASSOCIATED WITH A TPH ORGANIZATION, NAME OF ORGANIZATION:	

11. As an individual TPH, nominee/"registered for," or the Senior Reporting Person for a TPH organization, it is required as a condition of employment that all non-TPH employees (as referenced in item 10, answer "c") must provide copies of all confirms and monthly account statements for such accounts to you. You are required to conduct periodic reviews of trading in non-TPH employee's securities brokerage accounts to ascertain if the employee has traded on the basis of material nonpublic information. Attachment B, *Employee Account Checklist*, is intended to facilitate such reviews. These reviews must be conducted at least quarterly. Include Attachment B in your submission of this form.

Have all non-TPH employee securities brokerage accounts been reviewed by you as described above and on Attachment B?

- a. _____ Yes
- b. _____ No

If you answered "No" to the above, please explain below or in a separately attached document:

The undersigned states and attests as follows:

I understand that should I or any of my employees or associated persons (if any) acquire material nonpublic information concerning a corporation whose shares are publicly traded, it would be a violation of CBOE and/or C2 Rules (as applicable) to trade in any securities issued by the corporation or options or other derivative securities thereon while such information remains material and nonpublic.

I further understand that should I or any of my employees or other associated persons obtain material nonpublic information concerning imminent transactions in an underlying security, neither I nor any of my employees and associates will take advantage of such knowledge by trading in the underlying security or options thereon, while such information remains material and nonpublic.

I further understand that it is a violation of CBOE and/or C2 Rules (as applicable) for me, my employees or other associated persons (if any) to disclose to another person material nonpublic corporate or market information in any security, while such information remains material and nonpublic.

The undersigned attests that all information provided above is correct to the best of my knowledge and belief. I understand that it is a violation of CBOE and/or C2 Rule 4.6 (as applicable) to knowingly or negligently make any false statement on this form and/or any related documents.

Signature

Date

Name (type or print)

Acronym

This form and all attachments must be filed annually with the CBOE. In addition, you or the TPH organization must keep copies of this form, the related attachments, and all other related documents for a period of three years, the first two in an easily accessible place.

All OE-418 documents listed above can be downloaded from <http://www.cboe.org/RegForms> and should be emailed as attachments to OE418@cboe.com no later than sixty (60) calendar days after December 31st each year.

NOTE: If you are associated with a TPH organization that has more than one nominee/"registered for," please submit all such person's OE-418 forms together as attachments in one emailed response.

ATTACHMENT A TO CBOE/C2 FORM OE-418

AFFIRMATION OF COMPLIANCE BY NON-TPH EMPLOYEES

To be completed and signed by each non-TPH employee of TPHs and TPH organizations using form OE-418 to comply with CBOE/C2 Rule 4.18. This form should be completed at the start of employment and once per year thereafter.

The undersigned states and attests as follows:

I understand that should I acquire material nonpublic information concerning a corporation whose shares are listed on a national securities exchange, it would be a violation of CBOE and/or C2 Rules (as applicable) and Federal Securities Laws for me or my employer to trade in any securities issued by the corporation or options or other derivative securities thereon while such information remains material and nonpublic.

I further understand that should I obtain material nonpublic information concerning the market in an underlying security, neither I nor my employer may take advantage of such knowledge by trading in the underlying security or options thereon, while such information remains material and nonpublic. I understand that such information includes, but is not limited to, information obtained in the course of receiving execution reports and information obtained in the course of negotiating to participate in transactions of block size.

I further understand that should I obtain material nonpublic market or corporate information concerning a publicly traded security it would be a violation of CBOE and/or C2 Rules (as applicable) and Federal Securities Laws for me to disclose such information to another person while such information remains material and nonpublic.

Do you have or exercise control over any securities accounts at any brokerage firms?

_____ Yes _____ No

If yes, print name of brokerage firm carrying the account and the account number:

Name: _____

Signature: _____

Employer/TPH Organization: _____

Date: _____

ATTACHMENT B TO CBOE/C2 FORM OE-418

EMPLOYEE ACCOUNT CHECKLIST

To be completed by Senior Reporting Party and Individual TPHs who employ non-TPH employees who maintain securities brokerage accounts.

The checklist is intended to facilitate the review of employee accounts as required by Exchange Rule 4.18. The checklist, account statements and Attestations of Compliance must be maintained for three years, two years in an easily accessible place. *A minimum of one month per quarter must be reviewed, and a copy of the attached form must be completed for each account reviewed.* These forms must be made available to CBOE and/or C2 (as applicable) upon request.

Monthly account statements for all employee accounts for the quarter ending _____ (Date) have been reviewed.
This review was completed on _____ (Date).
Month(s) reviewed include:
_____ (Month) _____ (Month) _____ (Month)

Upon completion of the review, notify the Regulatory Division of CBOE/C2 via email at OE418@cboe.com immediately if you believe that the employees reviewed may have misused material nonpublic information.

The undersigned attests that a review for all employee accounts has been conducted personally and that any unusual activity has been brought to the attention of _____.	
Signature _____	Date _____
Print Name _____	Title _____
_____ TPH Organization, if applicable	

ACCOUNT REVIEW

This form is provided by CBOE to facilitate TPH organizations in the review of non-TPH employees who maintain securities brokerage accounts and are using form OE-418 to comply with CBOE Rule 4.18.

SECTION I – IDENTITY OF ACCOUNT REVIEWED

ACCOUNT NAME:	ACCOUNT NUMBER:
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SECTION II

In addition to trading while in possession of material nonpublic corporate information, taking advantage of material nonpublic information regarding an employer's impending transactions is a violation of CBOE and/or C2 Rule 4.18 (as applicable). A review of activity in relationship to questions 1 through 3 may indicate a non-TPH employee is taking advantage of such material nonpublic information regarding his employer's activity.

<p>1. Has any employee traded in the same security or related security in which an associated TPH regularly trades?</p> <p>_____ Yes _____ No</p> <p>2. Has any employee engaged in day trading of positions which involve securities that the TPH also traded that day?</p> <p>_____ Yes _____ No</p> <p>3. Does it appear that the employee effected transactions based upon advance knowledge of the TPH's impending transactions?</p> <p>_____ Yes _____ No</p> <p>4. Does it appear that the employee possibly misused material nonpublic corporate information to effect transactions in a personal account or related account?</p> <p>_____ Yes _____ No</p>

If the answer is "yes" to item 3 or 4, the Regulatory Division of CBOE/C2 (OE418@cboe.com) must be contacted immediately.

SECTION III

CBOE/C2 does **not** require that this form be submitted with form OE-418 and its attachments. Copies of documents used to complete your review should be maintained on file with this form for three years, the first two in an easily accessible place. (Generally, these will consist of account statements and/or confirmation slips.)