



2001 Pennsylvania Avenue NW
Suite 600
Washington, DC 20006
Tel +1 202.466.5460

March 19, 2020

The Honorable Lori E. Lightfoot
Mayor of Chicago
Office of the Mayor
121 North LaSalle Street
City Hall, Room 406
Chicago, Illinois 60602

Dear Mayor Lightfoot:

Thank you for your continued leadership and responsiveness aimed at stemming the outbreak of the COVID-19 global pandemic on the citizens of Chicago. Your numerous executive orders have been decisive steps needed to help slow the spread of this virus and provide economic relief to Chicagoans. We understand that all measures need to be on the table for stopping the outbreak. However, we want to express our views with respect to any proposed “shelter-in-place” directive and its impact on financial market operations.

FIA represents the global futures and listed derivatives industry, which has its founding roots in Chicago. Critical parts of our industry’s infrastructure and ecosystem are located in Chicago, including the Chicago Mercantile Exchange (CME), the Chicago Board Options Exchange (Cboe) and the Options Clearing Corporation (OCC). Chicago is also home to many Future Commission Merchants (FCMs) that provide customers—such as farmers and agricultural co-ops—with access to exchanges. Additionally, Chicago houses many liquidity providers and vendors with systems and networks critical to making sure the futures and options markets continue to function.

As you know, the financial services sector is designated as critical infrastructure by the U.S. Department of Homeland Security. This designation correctly identifies that the disruption of the sector “would have a debilitating effect on security, national economic security, national public health and safety, or any combination thereof.”

We believe any such action by your office or that of the Office of the Governor to require citizens to shelter-in-place must allow essential members of the Chicago financial markets to continue to access critical systems and facilities for the benefit of the broader U.S. and global economies. Should the State of Illinois or City of Chicago impose any type of quarantine, it is imperative that financial services personnel deemed essential to maintaining financial market operations be exempted. This is consistent with recent actions in other jurisdictions and previous national crises.

While the financial sector has adapted and implemented work from home policies as part of our Business Continuity Plans, firms must have limited essential personnel onsite to maintain orderly market operations. Failure to provide an exemption for essential personnel of exchanges, clearinghouses, banks, broker-dealers, FCMs and principal traders would impair market operations to the detriment of the Illinois and overall global economy.



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We are committed to working with you and the City of Chicago to maintain the safety of Illinois citizens while ensuring critical parts of our economy continue to function. We applaud your leadership during this crisis and stand ready to assist.

Kind regards,

A handwritten signature in black ink that reads "Walt L. Lukken". The signature is written in a cursive, flowing style.

Walt Lukken

CC: The Honorable JB Pritzker, Governor, State of Illinois