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March 19, 2020

The Honorable JB Pritzker
Governor of Illinois
Office of the Governor
James R. Thompson Center
100 W. Randolph, 16-100
Chicago, IL 60601

Dear Governor Pritzker:

Thank you for your continued leadership and responsiveness aimed at stemming the outbreak of the COVID-19 global pandemic on the citizens of Illinois. Your recent Disaster Proclamation and numerous executive orders have been decisive steps needed to help slow the spread of this virus. 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 City of Chicago 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 State of Illinois 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 Lori Lightfoot, Mayor, City of Chicago