



*In re JPMorgan Treasury Futures Spoofing Litigation*  
**ELECTRONIC CLAIMS FILING GUIDELINES**



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## Overview

Electronic Claims Filing applies to institutions or entities that are filing multiple Proof of Claim and Release forms on behalf of themselves and/or others, as well as individuals or entities that are filing Proof of Claim and Release forms with a large number of transactions (50+).

Electronic Claims Filings are subject to rejection if not prepared in compliance with these Electronic Claims Filing Guidelines.

PLEASE NOTE: No Electronic Claims Filings will be considered to have been properly submitted unless the Claims Administrator issues to the filer a written acknowledgment of receipt and acceptance of electronically submitted data.

## Electronic Filing Requirements

### I. Complete and Sign a paper Proof of Claim and Release form:

- One executed “paper” master Proof of Claim and Release form should be completed per submission. This Proof of Claim and Release form serves as a master Proof of Claim and Release form for one or all of the accounts included on your file. The Proof of Claim Form is attached hereto as Appendix B.
- Be sure to include company name, account name/number, and company address. If submitting an electronic file on behalf of several accounts, enter “Various Accounts” for the account name/number.
- Complete the signature page on the Proof of Claim and Release form. If you are filing on behalf of your clients, you must include a letter or document providing your authorization to sign on behalf of your clients, as set forth in Appendix C.
- A valid email address must be on file with the Claims Administrator. Communication regarding deficiencies and rejections on electronically filed claims may be conducted by email. A valid email address **MUST** be included on the Proof of Claim and Release form, and the email address provided **MUST** be updated in the event the contact person or email address changes; it is the sole responsibility of the filing party to maintain up-to-date, complete contact information with the Claims Administrator.

### II. Prepare a cover letter:

- A cover letter **MUST** be included with the master Proof of Claim and Release form. The cover letter must include the total number of accounts; total number of transactions; total number of U.S. Treasury Futures or Options purchased, acquired, and sold; and contact name(s) with phone number(s) and email address(es). Please see the sample cover letter as set forth in Appendix D.



### III. Prepare a data file:

- An Excel spreadsheet or other electronic file containing account information and transactional data **MUST** be prepared in accordance with A.B. Data, Ltd.'s Electronic Claims Filing Template Mapping Instructions found in Appendix E. The following formats are acceptable: a) MEDIA: CD, DVD, and flash drive and b) DATA: ASCII, MS Excel, and MS Access. For your convenience, an Excel spreadsheet template is available for your use and may be downloaded from the settlement website.
- If you cannot provide the information in the aforementioned formats or you have other requests, questions, concerns, or comments, please email A.B. Data, Ltd., at [efiling@abdata.com](mailto:efiling@abdata.com) or you may call 1-877-888-8593 (or 1-414-921-0342 if calling from outside the United States or Canada) to speak to an Electronic Claims Filing Specialist.

### IV. Mail your executed master Proof of Claim and Release form with a cover letter and media format to:

JPMorgan Treasury Futures Class Action Settlement  
Attention: Electronic Claims Department  
c/o A.B. Data, Ltd.  
3410 West Hopkins Street  
Po Box 173083  
Milwaukee, WI 53217

#### Documentation Requirements

A.B. Data, Ltd., reserves the right to request additional documentation at any time after your Proof of Claim and Release form and file have been received and processed. The documentation provided should be sufficient to verify the validity and accuracy of the data provided in the file.

If you provided a letter/affidavit attesting to the truth and accuracy of your data when initially submitting your file, A.B. Data may still require specific documentary evidence (trade confirmations, monthly statement, or equivalent) to verify the details of your transactions and/or holdings.

#### Claim Balancing

All transactions must be positive values.



## Appendix A

### Case Specific Information

CLASS DEFINITION:	All Persons And Entities Wherever Located That Transacted In U.S. Treasury Futures Or Options On U.S. Treasury Futures On United States-Based Exchanges, Including But Not Limited To The Chicago Mercantile Exchange, Including Its Subsidiary The Chicago Board Of Trade, From April 1, 2008 Through January 31, 2016 (The “Class Period”)
CLAIM FILING DEADLINE:	June 30, 2022

**Transactions for each account should include:**

Transaction Type	Definition	Valid Dates
P	Purchases/acquisitions during the Class Period.	April 1, 2008 through January 31, 2016, inclusive
S	Sales during the Class Period.	April 1, 2008 through January 31, 2016, inclusive

**\*\*\*Please see Appendix E for mapping instructions detailing how to properly submit your file. Files submitted that do not follow the mapping instructions are subject to rejection.**



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## Appendix B



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This Form Must Be Electronically  
Submitted OR Postmarked AND Mailed No  
Later Than June 30, 2022.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE JPMORGAN TREASURY FUTURES SPOOFING  
LITIGATION

Case No.: 1:20-cv-03515 (PAE)

**PROOF OF CLAIM AND  
RELEASE**

**I. INSTRUCTIONS**

1. If you transacted in U.S. Treasury Futures or Options on U.S. Treasury Futures on United States-based exchanges, including but not limited to the Chicago Mercantile Exchange, including its subsidiary the Chicago Board of Trade, from April 1, 2008 through January 31, 2016 (the “Class Period”), you may be eligible to receive a payment from the \$15.7 million settlement reached between Class Plaintiffs and Defendants JPMorgan Chase & Co., J.P. Morgan Clearing Corp. (now known as J.P. Morgan Securities LLC), J.P. Morgan Securities LLC, and J.P. Morgan Futures, Inc. (now known as J.P. Morgan Securities LLC) (collectively, “JPMorgan”) in *In re JPMorgan Treasury Futures Spoofing Litigation*, No. 1:20-cv-03515 (PAE) (S.D.N.Y.).

2. “U.S. Treasury Futures” means: (i) 2-year T-Note Futures; (ii) 3-year T-Note Futures; (iii) 5-year T-Note Futures; (iv) 10-year T-Note Futures; (v) Ultra 10-year T-Note Futures; (vi) U.S. Treasury Bond Futures; and (vii) Ultra U.S. Treasury Bond Futures. “Options on U.S. Treasury Futures” means any option on U.S. Treasury Futures.

3. Unless otherwise defined herein, all capitalized terms contained in this proof of claim and release (“Claim Form”) have the same meaning as in the accompanying **Notice of Proposed Class Action Settlement, May 31, 2022, Fairness Hearing Thereon and Class Members’ Rights** (“Notice”) and the Stipulation and Agreement of Settlement between Class Plaintiffs and JPMorgan, which are available at [www.treasuryfuturesclassactionsettlement.com](http://www.treasuryfuturesclassactionsettlement.com) (the “Settlement Website”).

4. It is important that you read the Notice that accompanies this Claim Form. By signing and submitting this Claim Form, you will be certifying that you have read the Notice, including the terms of the Release and Covenant Not to Sue described in the Notice under the heading “What Am I Giving Up To Receive A Payment?” and provided for in the Settlement Agreement.

5. To be eligible to receive a payment from the Net Settlement Fund, you must submit a timely and valid Claim Form along with the required data and/or information described in Parts II through IV below. **To be considered timely, your Claim Form must be submitted online at [www.treasuryfuturesclassactionsettlement.com](http://www.treasuryfuturesclassactionsettlement.com) by 11:59 p.m. Eastern Time on June 30, 2022 OR postmarked and mailed to the Settlement Administrator no later than June 30, 2022.** If you are unable to submit the required data as described below at Parts II through IV, you should call the Settlement Administrator for further instructions.

6. As described in Part III below, you are required to submit additional information about your transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures as part of your Claim Form to be submitted to the Settlement Administrator.

7. Your payment amount will be determined based on the Settlement Administrator’s review of your Claim Form and calculated pursuant to the Distribution Plan that the Court approves. Submission of a Claim Form does not guarantee that you will receive a payment from the Settlement. For more information, please refer to the Notice and Distribution Plan available at the Settlement Website.

This Form Must Be Electronically Submitted OR Postmarked AND Mailed No Later Than June 30, 2022.

8. Separate Claim Forms should be submitted for each separate legal entity. Conversely, a single Claim Form should be submitted on behalf of only one legal entity.

9. If you have questions about submitting a Claim Form or need additional copies of the Claim Form or the Notice, you may contact the Settlement Administrator.

**II. CLAIMANT IDENTIFICATION**

The Settlement Administrator will use this information for all communications relevant to this Claim Form. If this information changes, please notify the Settlement Administrator in writing. If you are a trustee, executor, administrator, custodian, or other nominee and are completing and signing this Claim Form on behalf of the Claimant, you must attach documentation showing your authority to act on behalf of Claimant.

**Section A – Claimant Information**

Claimant's First Name MI Claimant's Last Name

Co-Claimant's First Name MI Co-Claimant's Last Name

[Empty grid for address line]

Representative or Custodian Name (if different from Claimant[s] listed above)

Claimant Address 1 (street name and number)

Claimant Address 2 (apartment, unit, or box number)

City State ZIP Code/Postal Code

Province/Region (if outside U.S.)

Claimant Country (if outside U.S.)

[Empty grid for address line]

Telephone Number (home or cell) Telephone Number (work)

Email Address (If you provide an email address, you authorize the Settlement Administrator to use it in providing you with information relevant to this claim.)





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Later Than June 30, 2022.

### III. REQUIREMENTS FOR CLAIM SUBMISSION

#### 1. YOU MUST SUBMIT YOUR CLAIM FORM ELECTRONICALLY OR ON PAPER IN THE REQUIRED FORMAT

Claimants must electronically submit their Claim Forms online at [www.treasuryfuturesclassactionsettlement.com](http://www.treasuryfuturesclassactionsettlement.com) by **11:59 p.m. Eastern Time on June 30, 2022, OR postmark and mail** the Claim Forms to the Settlement Administrator at JPMorgan Treasury Futures Class Action Settlement, c/o A.B. Data, Ltd., P.O. Box 173083, Milwaukee, WI 53217 **no later than June 30, 2022**. Claim Forms must be submitted in the format specified in this Claim Form or posted by the Settlement Administrator on the Settlement Website.

Along with your Claim Form, you are required to submit the details of your transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures reflected in Part IV, below. A Data Template, including the information you must provide about your transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures is below and also available at the Settlement Website. In addition, please provide any of the following types of supporting documentation that verifies the transaction information you provide:

- a. Transaction data from your bank, broker, or internal trade system;
- b. Bank confirmations by individual trade;
- c. Bank transaction reports or statements;
- d. Trading venue transaction reports or statements;
- e. Prime broker reports or statements;
- f. Custodian reports or statements;
- g. Daily or monthly account statements or position reports;
- h. Email confirmations from counterparty evidencing transactions;
- i. Bloomberg confirmations or communications evidencing transactions; and/or
- j. Other documents evidencing transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures during the Class Period.

Please keep all data and documentation related to your eligible U.S. Treasury Futures or Options on U.S. Treasury Futures transactions. Having data and documentation may be important to substantiating your Claim Form.

This Form Must Be Electronically Submitted OR Postmarked AND Mailed No Later Than June 30, 2022.

**IV. TABLE OF TRANSACTIONS IN U.S. TREASURY FUTURES OR OPTIONS ON U.S. TREASURY FUTURES**

Complete this Part IV if and only if you entered into transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures from April 1, 2008 through January 31, 2016. Do not include information regarding instruments other than U.S. Treasury Futures or Options on U.S. Treasury Futures and do not include transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures in which you acquired the instrument as an agent for another individual or entity.

**List of Brokers or Futures Commission Merchants**

Please list all brokers or futures commission merchants (“FCMs”) at which you maintained accounts in which you traded or held U.S. Treasury Futures or Options on U.S. Treasury Futures.


**List of Account Names and Account Numbers**

Please provide a list of all account names and account numbers for each entity you listed in response above in which you traded or held U.S. Treasury Futures or Options on U.S. Treasury Futures.


This Form Must Be Electronically Submitted OR Postmarked AND Mailed No Later Than June 30, 2022.


**TABLE I - PURCHASE(S) AND SALE(S) OF U.S. TREASURY FUTURES CONTRACTS DURING THE SETTLEMENT CLASS PERIOD**

For each purchase or sale of U.S. Treasury Futures on a United States-based exchange, provide the following information for each transaction:

<b>Contract Traded (Description or Code)</b>	<b>U.S.-based Exchange</b>	<b>Trade Date (MM/DD/YYYY)</b>	<b>Number of Contracts</b>	<b>Transaction Price</b>	<b>Purchase or Sale (P/S)</b>	<b>Brokerage Firm and Account Number in Which Transaction Was Made</b>

This Form Must Be Electronically Submitted OR Postmarked AND Mailed No Later Than June 30, 2022.

**TABLE II - PURCHASE(S) AND SALE(S) OF OPTIONS ON U.S. TREASURY FUTURES DURING THE SETTLEMENT CLASS PERIOD**

For each purchase or sale of an Option on U.S. Treasury Futures on a United States-based exchange, provide the following information for each transaction:

<b>Contract Traded (Description or Code)</b>	<b>Trade Date (MM/DD/YYYY)</b>	<b>Call (C) or Put (P)</b>	<b>Expiry Type (American or European)</b>	<b>Strike Price</b>	<b>Option Premium</b>	<b>Settlement/ Exercise Date</b>	<b>Number of Contracts</b>	<b>Traded Price (price of futures contract)</b>	<b>Purchase or Sale (P/S)</b>	<b>Brokerage Firm and Account Number in Which Transaction Was Made</b>

## V. CLAIMANT'S CERTIFICATION & SIGNATURE

### SECTION A: CERTIFICATION

#### **BY SIGNING AND SUBMITTING THIS CLAIM FORM, CLAIMANT OR CLAIMANT'S AUTHORIZED REPRESENTATIVE CERTIFIES ON CLAIMANT'S BEHALF AS FOLLOWS:**

1. I (we) have read the Notice and Claim Form, including the descriptions of the Release and Covenant Not to Sue provided for in the Settlement Agreement;
2. I (we) am (are) a Class Member and am (are) not one of the individuals or entities excluded from the Settlement Class;
3. I (we) have not submitted a Request for Exclusion;
4. I (we) have made the transactions submitted with this Claim Form for myself (ourselves) and not as agents of another, and have not assigned my (our) Released Claims to another;
5. I (we) hereby warrant and represent that I (we) have not assigned or transferred or purported to assign or transfer, voluntarily or involuntarily, any matter released pursuant to the release or any other part or portion thereof;
6. I (we) have not submitted any other claim in this Action covering the same transactions and know of no other person having done so on his/her/its/their behalf;
7. I (we) hereby consent to the disclosure of, waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to, and instruct JPMorgan or any authorized third party to disclose my (our) information and transaction data relating to my (our) trades for use in the claims administration process;
8. I (we) submit to the jurisdiction of the Court with respect to my (our) claim and for purposes of enforcing the releases set forth in any Final Judgment that may be entered in the Action;
9. I (we) agree to furnish such additional information with respect to this Claim Form as the Settlement Administrator or the Court may require; and
10. I (we) acknowledge that I (we) will be bound by and subject to the terms of the Judgment that will be entered in the Action if the Settlement is approved.
11. I (we) certify that I am (we are) not subject to backup withholding under the provisions of Section 3406(a)(1)(C) of the Internal Revenue Code.

**SECTION B: SIGNATURE**

**PLEASE READ THE RELEASE, CONSENT TO DISCLOSURE AND CERTIFICATION, AND SIGN BELOW.**

I (we) acknowledge that, as of the Effective Date of the Settlement, pursuant to the terms set forth in the Settlement Agreement, and by operation of law and the Final Judgment, I (we) shall be deemed to release and forever discharge and shall be forever enjoined from prosecuting the Released Claims against the Released Parties (as defined in the Settlement Agreement and/or Final Judgment).

By signing and submitting this Claim Form, I (we) consent to the disclosure of information relating to my (our) transactions in U.S. Treasury Futures or Options on U.S. Treasury Futures during the Class Period, and waive any protections provided by any applicable bank secrecy or data privacy laws (whether foreign or domestic), or any similar confidentiality protections with respect to information and transaction data relating to my (our) trades, for use in the claims administration process.

If signing as an Authorized Representative on behalf of an entity, I (we) certify that I (we) have legal rights and authorization from the entity to file this Claim Form on the entity's behalf.

**UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA, I (WE) CERTIFY THAT ALL THE INFORMATION PROVIDED BY ME (US) ON THIS CLAIM FORM IS TRUE, CORRECT, AND COMPLETE AND THAT THE DATA SUBMITTED IN CONNECTION WITH THIS CLAIM FORM ARE TRUE AND CORRECT COPIES OF WHAT THEY PURPORT TO BE.**

\_\_\_\_\_  
Signature of Claimant (if Claimant is an individual filing on his or her own behalf)

Date: \_\_\_\_\_  
MM/DD/YY

\_\_\_\_\_  
Print Name of Claimant (if Claimant is an individual filing on his or her own behalf)

\_\_\_\_\_  
Authorized Representative Completing Claim Form (if any)

Date: \_\_\_\_\_  
MM/DD/YY

\_\_\_\_\_  
Print name of Authorized Representative Completing Claim Form (if any)

\_\_\_\_\_  
Capacity of Authorized Representative (if other than an individual (e.g., trustee, executor, administrator, custodian, or other nominee))

**REMINDER: YOUR CLAIM FORM AND REQUIRED DATA MUST BE SUBMITTED ONLINE BY 11:59 P.M. EASTERN TIME ON JUNE 30, 2022, OR POSTMARKED AND MAILED NO LATER THAN JUNE 30, 2022.**

## Appendix C

### Authorization Requirements

- 1 **If you are a nominee** filing on behalf of your account holders, you **must** include the following documentation:
  - 1.1. Affidavit attesting that your entity has legal rights and authorization from your account holders to file Proof of Claim and Release forms on their behalf **and** that your account holders understand that they are bound by and subject to the terms of all releases that may be entered in this Settlement, etc.; **and**
    - 1.1.1 Authorization to sign on your account holders' behalf.
  - 1.2 **If you are a third party** filing on behalf of a nominee, you **must** include an Affidavit attesting to the following:
    - 1.2.1 Your entity has the legal right and authorization from the nominee to file and sign any Proof of Claim and Release forms on their behalf; **and**
    - 1.2.2 Your entity has the legal right and authorization from the nominee's account holders to file and sign any Proof of Claim and Release forms on their behalf; **and**
    - 1.2.3 The account holders understand they are bound by and subject to the terms of all releases that may be entered in the *In re JPMorgan Treasury Futures Spoofing Litigation*.
  - 1.3 **If you are a third party** filing on behalf of another party, you **must** include an Affidavit attesting to the following:
    - 1.3.1 Your entity has the legal right and authorization from the other party to file and sign any Proof of Claim and Release forms on its behalf; **and**
    - 1.3.2 The other party understands it is bound by and subject to the terms of all releases that may be entered in the *In re JPMorgan Treasury Futures Spoofing Litigation*.
  - 1.4 **IF YOU ARE NOT A NOMINEE OR A THIRD PARTY AND WOULD LIKE TO FILE CLAIMS ELECTRONICALLY, YOU MUST INCLUDE DOCUMENTATION SUPPORTING ALL TRANSACTIONAL DATA OF YOUR CLAIM.**

You must submit supporting documentation with your Proof of Claim and Release form that will support the transactions provided in your file. These documents may include, but are not limited to, a) photocopies of confirmation slips; b) photocopies of monthly statements reflecting ALL transactional data and how it was compiled for the opening of the Class Period through the end of the Class Period; or c) a signed letter from your broker, on their letterhead, providing all of the information that would be found on a confirmation slip and/or other aforementioned documents.





## Appendix D

### Sample Cover Letter

LETTERHEAD

Re: *In re JPMorgan Treasury Futures Spoofing Litigation*

Date:

Enclosed is a fully executed master Proof of Claim and Release form with required authorizations and affidavits as well as an electronic media attachment, which is being filed in connection with the above-referenced matter on behalf of [COMPANY NAME(S) OR INDIVIDUAL NAME(S)] for the proprietary accounts of [ENTITY].

We, [ENTITY], hereby agree that further communication from the Claims Administrator may be conducted by email, and we accept sole responsibility to ensure the email address for [ENTITY] is updated in the event the email address provided on the master Proof of Claim and Release form should change.

The attachment consists of a [CD, DVD, OR FLASH DRIVE] containing [NUMBER] accounts/claims in [ASCII, MS EXCEL, OR MS ACCESS] format with [NUMBER OF TRANSACTIONS] transactions for U.S. Futures/Options for [ENTITY]'s proprietary accounts. Each transaction contains corresponding account information for which the claims are being filed. A complete listing of all account names and numbers can be found on the next page.

The total number of U.S. Futures/Options purchased or acquired [##.##] for the amount of [\$0.0000] and U.S. Futures/Options sold [##.##] for the amount of [\$0.0000]<sup>1</sup> can be found on the enclosed [CD, DVD, OR FLASH DRIVE].

We, [ENTITY], attest that the data provided on the media attachment corresponds to [ENTITY]'s internal records.

I attest that the above information is true and correct.

Signature

Company Name

Job Title

Contact Information (including telephone number, fax number, and email address)

Account Name

Account Number

---

<sup>1</sup> Please list all other transactions, if applicable, including free receipts and free deliveries.



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## Appendix E

### Template Mapping Instructions – Transaction Detail Available

Column	Field Name	Max Length	OPTIONS ON U.S. TREASURY FUTURES FIELD DESCRIPTION
A	Account Identifier	40	Account identifier from cover page of filing.
B	Beneficial Owner Account Name	40	Name of individual, company, or entity associated with the account listed in Column A.
C	Full Name of the Beneficial Owner	40	Full name of the beneficial owner associated with the account listed in Column A.
D	TIN of the Beneficial Owner	9	Taxpayer identification number (TIN) for beneficial owner, no spaces and no dashes.
E	Beneficial Owner TIN Type (E/S/U/F)	1	<b>E</b> = Employer Identification Number (EIN); <b>S</b> = Social Security Number (SSN); <b>U</b> = Unknown; <b>F</b> = Foreign.
F	Care of:	40	Name of the entity to which correspondence and distributions should be mailed.
G	Attn:	40	Name of the person to whose attention correspondence and distributions should be mailed.
H	Street 1	40	Street Address 1 for correspondence and distributions mailing.
I	Street 2	40	Street Address 2 for correspondence and distributions mailing.
J	City	25	City for correspondence and distributions mailing.
K	State	2	State for correspondence and distributions mailing.
L	Zip Code	5	Zip code for correspondence and distributions mailing.
M	Province	40	Province for correspondence and distributions mailing.
N	Country	40	Country for correspondence and distributions mailing.
O	TIN of the Claimant	9	Taxpayer identification number (TIN) for claimant, no spaces and no dashes.
P	Brokerage Firm	40	Name of Brokerage firm executing the transaction. *Optional*
Q	Account Number	40	The account number in which the transaction was made. *Optional*
R	U.S.-based Exchange	4	Name the Exchange (such as CME).
S	Date of Transaction	10	<b>(MM/DD/YYYY)</b> <b>MM</b> = Month; <b>DD</b> = Day; <b>YYYY</b> = Year.
T	Contract Code	2	The two letter contract code.
U	Contract Month	3	The three letter abbreviation for the delivery month of the contract. (Mar, June, Sep, Dec).
V	Contract Year (YYYY)	4	The four digit year for the delivery of the contract.
W	Put or Call	4	P=Put, C=Call
X	Strike Price	13	Strike Price of transaction
Y	Transaction Type/Holdings (P or S)	2	<b>P</b> = Purchase; <b>S</b> = Sale.
Z	Number of Options	19	The total number of contracts involved in the particular transaction
AA	Option Price	13	Option price of the transaction
AB	Settlement/Exercise Date	10	Date of Contract Settlement. <b>(MM/DD/YYYY)</b> <b>MM</b> = Month; <b>DD</b> = Day; <b>YYYY</b> = Year.
AC	Expiry Type (American or European)	8	Expiry Type (American or European).

\*\*\* You MUST include a cover letter with your electronic file that provides the total number of accounts; total number of transactions; total number of purchases and sales; and contact name(s) with phone number(s) and email address(es) in the event that we have any questions or require further information. See Appendix B for a sample cover letter. Any electronic files not in accordance with these Electronic Claims Filing Guidelines are subject to rejection.



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