



Americans for Financial Reform
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No Offshore End-Run Around Derivatives Reform

To the Commissioners of the Commodity Futures Trading Commission:

We, the undersigned, urge you to stand up for rules that apply the transparency and safety requirements of the Dodd-Frank Act to all derivatives transactions relevant to U.S. markets, regardless of whether these transactions are routed through a foreign subsidiary or entity.

We need rules that cover all transactions, wherever they occur, which have the potential to jeopardize America's financial institutions and financial security. That's how the rules must to be structured in order to work.. And that's how Dodd-Frank was written. We call on you to uphold that standard.

Exempting the transactions of overseas subsidiaries from the full scope of derivatives regulation would be a giant loophole, encouraging banks to move transactions offshore and permitting an indefinite continuation of the kind of reckless activity that helped crash the economy in 2008.

Delay, too, can be a strategy for weakening and evading the law. Four years after the financial crisis and two years after the passage of Dodd Frank, it is time to insist on high standards that apply to all the derivatives transactions of U.S. banks and their subsidiaries.

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