

TO: Clearing Member Firms; Back Office Managers
FROM: CME Clearing
ADVISORY #: 22-425
DATE: November 2, 2022
SUBJECT: Customer Gross Margining Submission Reminders

Further to Clearing Advisory [22-170](#), CME Clearing reminds all clearing members that, pursuant to Rule 980.G, each clearing member has the obligation to include in each record in its CGM submission the legal entity identifier (“LEI”) of the relevant client account provided the client has an LEI. Further, Clearing Members must ensure that:

- where any client account LEI is submitted by a clearing member firm in a CGM file, the LEI is accurate and up to date and reflects the correct legal entity represented by the client account. In the majority of cases, each account should have a single LEI associated with it
- the client account name of the individual account owner for non-omnibus* accounts is accurate

These requirements are in addition to the existing requirement to report all positions for non-omnibus* accounts at the individual customer level, i.e., the owner of the account not the controller of the account.

**For fully and partially disclosed omnibus accounts, clearing firms should report client account contact information for each disclosed sub account as well as the owner of the omnibus account. For undisclosed omnibus accounts, clearing firms should report the client account contact information for the owner of the undisclosed omnibus account.*

For reference, here are earlier advisory notices on the topic:

- [LEI Submission in CGM Files under Rule 980.G - CME Group](#)
- [Chadv21-214.pdf \(cmegroup.com\)](#)
- [Chadv20-428.pdf \(cmegroup.com\)](#)

For more information, please contact CME Clearing at ccs@cmegroup.com or via phone at Chicago (312) 207 2525 | London (44) 203 379 3198 | Singapore (65) 6593 5591