

**Rostin Behnam**  
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## Profile

Currently **Distinguished Fellow** at the **Psaros Center for Financial Markets and Policy**, Georgetown University McDonough School of Business.

## Professional Experience

**U.S. COMMODITY FUTURES TRADING COMMISSION (CFTC)** Washington, D.C.

**Chairman & CEO**

**Unanimously confirmed by U.S. Senate January 2021-January 2025**

**Commissioner**

**Unanimously confirmed by U.S. Senate August 2017-January 2021**

**As Chair:**

### Market Oversight

- In a time of transformational technological change, I was at the **center of policy debate on cryptocurrency** regulation, identifying gaps in existing law and regulation, trajectory of technology and markets, integration with traditional financial markets, and market risks. My advocacy and expertise drove drafting of Congressional legislation to **increase CFTC regulatory and market policing authority**. Intensified focus on **AI regulation** in derivative markets to mitigate risk to registrants, customers, and markets.
- Upon U.S. Senate confirmation as Chair in 2021, outlined agenda identifying key policy areas to address, including enhancing risk management and resilience, strengthening customer protections, promoting efficiency and innovations, improving reporting data policy, addressing duplicative regulatory requirements, and amplifying international comity. Within two year period, achieved significant completion with majority support from Commission members.

### Organizational Leadership

- Negotiated overdue **pay reform**, return to office agreement, and negotiated telework with federal employee union. Negotiated **multimillion dollar office relocation** for the CFTC Washington, D.C. HQ with Government Services Administration. Replaced legacy IT system, including cloud transition, and implemented **heightened focus regarding cybersecurity**; grew data analytics capabilities and staff, including **first Chief Data and AI Officer** and **Chief Data Scientist**. Initiated multiple staff recruitment programs, created a staff mentorship program, implemented succession planning and reformed performance management.

### Domestic & Global Regulatory Cooperation

- Served as **Vice Chair of the International Organization of Security Commissions (IOSCO)**, a global multi-lateral organization of 200+ national financial regulators from 130 jurisdictions. Drove organization-wide management and policing initiatives. Served as Co-Chair on multi-lateral committees.
- Member of the **U.S. Financial Stability Oversight Council (FSOC)**, Chaired by Treasury Secretary, partnering with Council members from various federal and state market and banking regulators, and member of President's Working Group, examining critical market stability issues in various financial instruments and markets.

**As Commissioner:**

### Market Risk Advisory Committee

- As Sponsor of CFTC's Market Risk Advisory Committee, I placed over 200 experts onto 35 committees, negotiating sensitive political terrain to publish ***Managing Climate Risk in the U.S. Financial System*** (2020), the first government report showing the major risk climate change poses to the financial system, providing 53

policy recommendations for U.S. Congress and all financial regulators to address and mitigate this risk.

- Following 2017 decision by UK's Financial Conduct Authority to **end LIBOR** past 2021, convened team of experts to transition >\$190 trillion in derivatives contracts referencing USD LIBOR. Under my leadership, the subcommittee published industry accepted disclosures and conducted preparatory tabletop exercises.

## Policy

- **Authored >45 concurring and dissenting policy opinions** on matters before the CFTC, including cross-border policy, capital adequacy, speculative position limits, swap dealer registration, and rules related to bankruptcy, data reporting, automated trading, and digital assets.
- Participated in **14 Memoranda of Understanding with domestic and foreign regulators**, central banks, and international bodies for oversight and data collection of derivatives transactions and relevant systemically important financial institutions, and multiple FinTech cooperation agreements.

## **U.S. SENATE COMMITTEE ON AGRICULTURE, NUTRITION & FORESTRY Washington, D.C.**

*Senior Counsel to Ranking Member Stabenow*

**May 2013–Sept 2017**

*Counsel to Chairwoman Stabenow*

**Dec 2011–Apr 2013**

*Legislative Fellow to Chairwoman Stabenow*

**May 2011–Nov 2011**

- Strategic senior adviser to U.S. Senator on complex legislative and policy related to CFTC, other financial and banking supervisors and regulators during period of great transition following the global financial crisis.
- Lead negotiator/counsel in Committee reauthorization of CFTC's Commodity Exchange Act. Lead policy negotiator on passage of *2012 Pesticide Registration Improvement Act*; environmental provisions of *2014 Farm Bill*; *2015 Cotton Futures Act*; *National Bioengineered Food Disclosure Standard of 2016*

## **Early Career**

**GERSTEN SAVAGE LLP** New York, NY

*Associate*

**Mar 2008-Aug 2010**

**OFFICE OF THE NEW JERSEY ATTORNEY GENERAL, DIVISION OF CONSUMER AFFAIRS**

Newark, NJ

*Investigator, Bureau of Securities*

**Jan 2006–Feb 2008**

## **Education**

***Juris Doctor*, Syracuse University College of Law, Syracuse, NY**

**May 2005**

Admitted, New York State Bar

***A.B.*, English, Economics minor, Georgetown University, Washington, D.C.**

**May 2000**