



Information Circular: Citigroup Funding Inc. Safety First Trust Series 2007-2 Principal-Protected Certificates

To: Head Traders, Technical Contacts, Compliance Officers, Heads of ETF Trading, Structured Products Traders

From: William Slattery, Director, NASDAQ Listing Qualifications Department

DATE: April 25, 2007

Principal Protected Certificates	Symbol	CUSIP Number
Citigroup Funding Inc. Safety First Trust Series 2007-2 Principal-Protected Certificates Linked to the Nikkei 225 Index	AFO	78647U207

Citigroup Funding Inc. ("Issuer") issued Safety First Trust Series 2007-2 Principal-Protected Certificates ("Certificates") linked to the Nikkei 225 Index ("Index"). The new securities were issued at \$10 each with a maturity date of March 23, 2011.

At maturity for each Certificate, investors will receive the sum of (i) \$10.00 plus (ii) a Supplemental Distribution Amount calculated as follows:

(i) If the Final Index Value is greater than the Initial Index Value, the Supplemental Distribution Amount = \$10.00 X Index Return Percentage

(ii) Otherwise, the Supplemental Distribution Amount = zero

The Index Return Percentage is calculated as follows:

$$\frac{\text{Final Index Value} - \text{Initial Index Value}}{\text{Initial Index Value}}$$

The Initial Index Value is 17,451.77.

The Certificates are a series of unsecured debt issued by Safety First Trust and will be issued in book-entry form. The Trustee for the securities is The Bank of New York. The market value of the Certificates will depend substantially on the value of the underlying Index. Other factors that will likely affect the trading value of the Certificates are changes in interest rates, volatility of the Index, time remaining to maturity, and the credit rating of the Issuer.

The Certificates are guaranteed by the creditworthiness of Citigroup Funding Inc. The Certificates will be quoted and trade as an equity issue in round lots of 100 and will trade "flat" without accrued interest.

Investing in the Certificates is not equivalent to investing in the Index or its component stocks.

Trading in the Certificates on NASDAQ is subject to [NASDAQ equity trading rules](#). The Certificates will trade from 7:00 a.m. until 8:00 p.m. The SEC short sale rule (SEC Rule 10a-1) applies to trading in the Certificates.

Trading of Certificates on NASDAQ is subject to the provisions of [NASDAQ Rule 2310](#). Members recommending transactions in Certificates to customers should make a determination that the recommendation is suitable for the customer. In addition, members must possess sufficient information to satisfy the “know your customer” obligation that is embedded in the NASDAQ Conduct Rules.

Members also should review [NASD Notice to Members 03-71](#) for guidance on trading these products. The Notice reminds members of their obligations to: (1) conduct adequate due diligence to understand the features of the product; (2) perform a reasonable-basis suitability analysis; (3) perform customer-specific suitability analysis in connection with any recommended transactions; (4) provide a balanced disclosure of both the risks and rewards associated with the particular product, especially when selling to retail investors; (5) implement appropriate internal controls; and (6) train registered persons regarding the features, risk and suitability of these products.

This Information Circular is not a statutory prospectus. NASDAQ members should consult the registration statement or prospectus for the Certificates product for additional information.

Inquiries regarding this Information Circular should be directed to:

- [Will Slattery](#), Director, NASDAQ Listing Qualifications, at 301.978.8088
- [NASDAQ Market Sales](#) at 800.846.0477