



REGULATORY INFORMATION BULLETIN

RB-08-177
November 20, 2008

TO: ETP Holders

SUBJECT: Citigroup 8.5% Exxon Mobil Corporation ELKS

Compliance and supervisory personnel should note that, among other things, this Information Bulletin discusses customer suitability. Please forward this Information Bulletin to other interested persons within your organization.

The following equity linked notes (“Notes” or “Securities”) has been approved for Listing¹ on NYSE Arca and will commence trading on November 24, 2008:

Equity Linked Notes

Symbol

8.5% Exxon Mobil Corporation ELKS due March 25, 2009

ESM

Background Information on the Security

As more fully set forth in the Prospectus Supplement, the Citigroup Funding Inc., the 8.50% Equity Linked Securities (“ELKS[®]”) based upon the common stock of Exxon Mobil Corporation were issued at \$10.00 and mature on March 25, 2009. For additional information regarding the Securities, please consult the Prospectus Supplement, filed with the Securities and Exchange Commission.

The ELKS are equity-linked securities that offer current income as well as limited protection against the decline in the price of the common stock of Exxon Mobil Corporation and are not principal protected. The ELKS[®] will pay a semi-annual coupon of 8.50% per annum. At maturity, investors will receive for each ELKS[®]; (i) 0.11488 shares of Exxon Mobil Corporation common stock, if Exxon Mobil Corporation stock trades at a price equal to or below \$67.46 from the Pricing Date to and including the Valuation Date on March 20, 2009 or (ii) \$10.00 per ELKS[®].

Since all payments, (whether of coupon or principal) which may be due to holders of ELKS[®] are the sole responsibility of the Issuer, it is the credit of Citigroup Funding Inc. and not Exxon Mobil Corporation.

Investors of ELKS[®] will not be entitled to any rights with respect to the underlying common stock shares including, with limitations, voting rights, the rights to receive any dividends or other

¹ The Notes are transferring their listing from NYSE Alternext US (f/k/a the American Stock Exchange) to NYSE Arca.

distributions in respect thereof and the right to tender or exchange the underlying common stock shares in any partial tender or exchange offer by Exxon Mobil Corporation common stock shares to investors of the ELKS[®] at maturity.

ETP Holders should advise purchasers that Exxon Mobil Corporation is not involved in the subject offering and has no obligation with respect to these securities whatsoever, including any obligations with respect to the principal amount to be paid at maturity, or to take the needs of the Issuer or holders of ELKS[®] into consideration. Any dividends or distributions to the underlying common stock will not be paid to holders of ELKS[®]. The ELKS[®] are a series of unsecured debt issued by Citigroup Funding Inc. ELKS[®] will be issued in book-entry form.

The ELKS[®] combine features of equity and debt. The terms of the ELKS[®] differ from those of ordinary debt securities in that the Issuer will not pay you a fixed amount at maturity.

Several factors, many of which are beyond our control, will influence the value of the ELKS[®]. One can expect that generally the market price of the underlying common stock shares on any day will affect the value of the ELKS[®] more than any other single factor. Other factors that may influence the value of the ELKS[®] include: supply and demand for the ELKS[®], volatility of the underlying stock, interest rates, economic, financial, political and regulatory or judicial events. In addition, the time remaining to maturity and the credit worthiness of Citigroup Funding Inc. may influence the pricing of the ELKS[®].

For additional information regarding the securities, please consult the pricing supplement.

Exchange Rules Applicable to Trading in the Security

The Securities are considered equity securities, thus rendering trading in the Securities subject to the Exchange's existing rules governing the trading of equity securities.

Trading Hours

The Securities will trade on NYSE Arca in the Opening, Core and Late Trading Sessions or from 4:00 a.m. ET until 8:00 p.m. ET in accordance with NYSE Arca Equities Rule 7.34(a).

Extended Hours Trading

ETP Holders are reminded of NYSE Arca Equities Rule 7.34(e) regarding Customer Disclosure and that trading in the securities during the Exchanges Opening and Late Trading Sessions may result in additional trading risks which include: (1) the underlying linked shares may not be actively trading or not trading at all during the Opening and Late Sessions, (2) lower liquidity in the Opening or Late Trading Sessions may impact pricing, (3) higher volatility in the Opening or Late Trading Sessions may impact pricing, (4) wider spreads may occur in the Opening or Late Trading Session.

Suitability

ETP Holders are reminded of their obligations under NYSE Arca Equities Rule 9.2(a)-(b) whereby the ETP holder shall use due diligence to learn the essential facts relative to every customer prior to trading the security or recommending a transaction in the security that an investment in the security is suitable for the customer. ETP Holders should adopt appropriate procedures for the opening and maintaining of accounts, including the maintaining of records prescribed by any applicable regulatory organization and by the rules and regulations of the Securities and Exchange Commission.

This Information Bulletin is not a statutory Prospectus.