

MARKETS WITH CLIENTS/COUNTERPARTIES HOLDING AGGREGATE POSITIONS ABOVE POSITION LIMITS OR ACCOUNTABILITY LEVELS ¹							
		CLIENT IDENTIFIED ²			INTERMEDIARIES ³		
U.S. CONTRACT MARKET	INDIVIDUAL/ ALL MONTH LIMIT	TOTAL	COMMERCIAL	NON-COMMERCIAL	TOTAL	SUBJECT TO SPECIAL CALL	NOT SUBJECT TO SPECIAL CALL
SPECULATIVE LIMITS							
WHEAT (CBOT)	5,000/6,500	7	1	6	11	11	-
COTTON	3,500/5,000	3	1	2	4	4	-
SOYBEANS	6,500/10,000	3	-	3	7	7	-
SOYBEAN OIL	5,000/6,500	3	2	1	1	1	-
LEAN HOGS	4,100/NA	2	-	2	5	5	-
CORN	13,500/22,000	1	1	-	9	9	-
LIVE CATTLE	5,400/NA	1	-	1	3	3	-
OATS	1,400/2,000	1	-	1	-	-	-
SOYBEAN MEAL	5,000/6,500	1	1	-	-	-	-
ACCOUNTABILITY LEVELS							
NATURAL GAS	6,000/12,000	32	24	8 (4)*	12	8	4
CRUDE OIL	10,000/20,000	20	14	6 (3)	10	10	-
HEATING OIL	5,000/7,000	11	9	-	2	2	-
RBOB GASOLINE	5,000/7,000	8	7	1 (1)	2	2	-
SUGAR NO. 11	10,000/15,000	6	4	2 (1)	9	9	-
COPPER	5,000/5,000	2	2	-	1	1	-
GOLD	6,000/6,000	2	1	1 (1)	4	3	1
PALLADIUM	1,000/1,000	1	1	-	-	-	-
PLATINUM	1,500/1,500	1	1	-	-	-	-
COFFEE	5,000/5,000	1	-	1 (0)	2	2	-
COCOA	6,000/6,000	-	-	-	1	1	-

*() number of noncommercial clients above the accountability level, but already known to the Exchange

¹ Exceeded a single-month or all-months-combined position limit or accountability level when directly held futures and option positions were aggregated with "equivalent positions" held through swaps dealers and index funds.

² Responder was able to identify the ultimate customer/principal.

³ Responder was only able to identify their client/counterparty as an intermediary.

**NON-COMMERCIAL CLIENTS HOLDING AGGREGATE POSITIONS
ABOVE POSITION LIMITS OR ACCOUNTABILITY LEVELS**

CONTRACT MARKET (IND/ALL MTH LIMITS)	CLIENT NAME	CLIENT DESCRIPTION	NET AFOC EXCH POS	NET AFOC OFF-EXCH POS	TOTAL NET AFOC POS
SPECULATIVE LIMITS					
WHEAT(CBOT) (5,000/6,500)	Yannix Management	US hedge fund	-3,234	-2,813	-6,047
	Ospraie	US hedge fund	882	-4,815	-3,933
	Stichting Pensionenfonds ABP	European pension fund	3,217	5,000	8,217
	ETFS Commodity Securities	European sponsor of ETF	0	8,930	8,930
	Clive Master Fund	European hedge fund	-4,906	-2,753	-7,659
	Schroders PLC	European hedge fund	5,461	7,005	12,466
COTTON (3,500/5,000)	ETFS Commodity Securities	European sponsor of ETF	0	4,665	4,665
	Schroders PLC	European hedge fund	2,863	8,172	11,035
SOYBEANS (6,500/10,000)	Bridgewater Assoc	US investment advisor	7,767	1,877	9,644
	Aisling Analytics	Asian hedge fund	5,873	1,996	7,869
	Schroders PLC	European hedge fund	5,161	5,044	10,205
SOYBEAN OIL (5,000/6,500)	Schroders PLC	European hedge fund	4,118	7,630	11,748
LEAN HOGS (4,100/NA)	Schroders PLC	European hedge fund	5,663	4,007	9,670
	Allianz Group	US fund/investment mgr	0	4,559	4,550
LIVE CATTLE (5,400/NA)	Bridgewater Assoc	US investment advisor	8,427	4,985	3,442
OATS (1,400/2,000)	Schroders PLC	European hedge fund	111	5,527	5,638
ACCOUNTABILITY LEVELS					
NATURAL GAS (6,000/12,000)	Bridgewater Assoc	US investment advisor	5,859	1,630	7,489
	Stichting Pensionenfonds ABP*	European pension fund	6,750	0	6,750
	Boone Pickens	US energy trader	13,100	17,140	30,240
	Citadel*	US hedge fund	-11,593	-2,636	-14,229
	Centaurus*	US hedge fund	-8,222	-8,488	-16,710
	Tom L Ward	US investor	4,496	12,703	17,199
	Aubrey McClendon	US investor	0	16,884	16,884
	DE Shaw*	US hedge fund	-15,225	1,179	-14,046
CRUDE OIL (10,000/20,000)	DE Shaw*	US hedge fund	-19,969	5,668	-14,301
	ATP Pension	European pension fund	0	12,692	12,692
	Govt of Singapore	Asian SWF	82	12,662	12,580
	Caisse de Depot et Placement	Canadian pension fund	0	-20,668	-20,668
	Bridgewater Assoc*	US investment advisor	19,158	5,653	24,811
	Stichting Pensionenfonds ABP*	European pension fund	34,651	0	34,651
RBOB GASOLINE (5,000/7,000)	DE Shaw*	US hedge fund	10,048	-1,200	8,848
SUGAR NO. 11 (10,000/15,000)	ETFS Commodity Securities*	European sponsor of ETF	0	15,536	15,536
	Schroders PLC	European hedge fund	6,164	19,260	25,424
GOLD (6,000/6,000)	Bridgewater Assoc*	US investment advisor	29,356	2,282	31,638
COFFEE (5,000/5,000)	Schroders PLC	European hedge fund	2,787	2,720	5,507