



CFE Position Limit Exemption Application

Submit to:

CBOE Futures Exchange, LLC (CFE)
Attention: CFE Regulation
400 S. LaSalle Street
Chicago, Illinois 60605
Fax: (312) 786-7744
E-mail: CFEReg@cboe.com

Please refer to CFE Rule 412, Position Limits, for CFE requirements related to position limits.

Reporting Market Participant: _____

Clearing Number of MP if MP is a Trading Privilege Holder (TPH): _____ Reporting ID: _____

Product(s): _____

Exemption Requested for Transaction(s): Bona Fide Hedge Risk Management Arbitrage Spread

Desired Time Duration to Exceed Position Limit Level(s): _____

Account Information				Futures Position	
Tax I.D. Number (Soc. Sec. #)	Name	Address	Account Number	Maximum Number of Long Contracts Market Participant Intends to Enter Into	Maximum Number of Short Contracts Market Participant Intends to Enter Into
			TOTAL		

Describe the current nature and size of the positions: _____

Describe the nature of the underlying exposure related to these positions: _____

Describe the trading strategy employed with respect these positions: _____

Describe the bona fide hedging or risk management activities with respect to these positions: _____

Describe, in detail, how the proposed transaction or position qualifies as a bona fide hedge transaction as defined in CFTC Rule 1.3(z), a risk management position consistent with CFTC guidelines, or an arbitrage or a spread transaction consistent with CFTC guidelines: _____

Describe whether the positions are subject to common ownership or control. An account is considered to be under common ownership or control if the person has a 10 percent or greater financial interest (i.e., ownership or profit interest) in the account or the person directs the trading in the account via a power of attorney or otherwise: _____

MP represents and covenants to CFE as follows:

1. Each transaction or position that is described above constitutes a bona fide hedge transaction as defined in CFTC Rule 1.3(z), a risk management position consistent with CFTC guidelines, or an arbitrage or a spread transaction, and such transaction or position is not used to attempt to violate or avoid any CFE Rule.
2. Each transaction or position that is described above is necessary or advisable as an integral part of the business of MP. A description of the business of MP is as follows: _____

3. The current and planned activity in the market underlying the Contract for which such exemption is requested is as follows: _____

4. The positions involved will be moved in an orderly manner based upon the characteristics of the market for which the exemption is sought and not initiated or liquidated in a manner calculated to cause unreasonable price fluctuations or unwarranted price changes.
5. MP has complied and will comply with all applicable CFTC requirements relating to hedging, risk management, arbitrage or spread transactions, as applicable.
6. Each bona fide hedge, risk management, arbitrage or spread transaction is accurately described in detail as follows:
 - a. Type of position(s) hedged, risk managed, arbitrated, or spread (include the dollar value of each position): _____

 - b. Calculation(s) utilized in determining the number and type of hedge, risk management, arbitrage, or spread requested: _____

 - c. Strategies which will be employed to manage the requested position(s): _____

 - d. Policies or guidelines of the MP regarding position management prior to or upon contract expiration: _____

 - e. Method of monitoring positions to ensure that all positions are executed pursuant to strategies described above and that the maximum limit is not exceeded: _____

 - f. Pre-determined levels of price movements, if any, that would cause a significant adjustment to the MP's position: _____

7. MP will promptly provide, upon request of CFE, information or documentation regarding the MP's financial condition.
8. CFE may, in its sole discretion, require the MP (a) not to further increase any positions that are above the applicable position limits, (b) to reduce any positions that are above the applicable position limits, or (c) to comply with any prospective limits prescribed by CFE which exceed the size of the positions controlled by the MP.
9. MP will comply with any terms, conditions, or limitations imposed by the Exchange with respect to the exemption.
9. CFE may, at anytime, rescind, limit or condition any exemption.
10. MP will promptly submit a supplemental statement explaining any material change in circumstances that may affect the nature of its

positions and any material change to the information provided herein.

11. MP will comply with all CFE rules, including Rule 412 and not use the positions involved to violate or avoid any CFE rule.
12. All information set forth in this form by MP is accurate and complete.

Report Date

Prepared by: _____

Signature _____

Attach additional sheets as needed to complete the above questions.

Form a/o 3/14