



Lisa Dunsky
Director and Associate General Counsel
Legal Department

March 26, 2012

BY ELECTRONIC FILING

Mr. David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

RE: Amendments to CME/CBOT/NYMEX Rule 981, Submission #12-094

Dear Mr. Stawick:

Pursuant to Commission Regulation 40.6(a), Chicago Mercantile Exchange Inc. (CME), the Chicago Board of Trade (CBOT) and New York Mercantile Exchange, Inc. (NYMEX) hereby notify the Commodity Futures Trading Commission that they will adopt revisions to CME, CBOT and NYMEX Rule 981 (Anti-Money Laundering). The proposed effective date for these revisions is April 10, 2012 (*i.e.*, immediately after the Commission's 10-business-day review period).

At present, CME, CBOT and NYMEX Rule 981 requires clearing members to develop and implement a written anti-money laundering program reasonably designed to achieve compliance with applicable requirements of the Bank Secrecy Act (31 U.S.C. § 5311, *et seq.*). We are revising Rule 981 to further require clearing members to have a written compliance program reasonably designed to achieve compliance with the International Emergency Economic Powers Act (50 U.S.C. § 1701, *et seq.*), the Trading with the Enemy Act (50 U.S.C. App. § 1, *et seq.*), and Executive Orders and regulations issued thereunder. The text of the proposed amendments to Rule 981 is set forth on Exhibit A, with additions underlined and deletions overstruck.

These amendments will expand Rule 981 to encompass all applicable Office of Foreign Asset Control (OFAC) sanctions programs. OFAC administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. OFAC acts under Presidential national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze assets under U.S. jurisdiction. OFAC sanctions are broad and extraterritorial in scope and all investments and transactions in the U.S., or involving U.S. persons or corporations, must comply.

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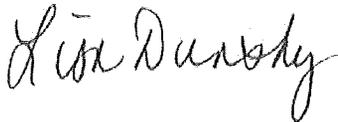
Amending Rule 981 to ensure that CME, CBOT and NYMEX clearing members have in place effective OFAC compliance procedures comports with DCO Core Principle C (Participant and Product Eligibility), by establishing appropriate eligibility standards.

No substantive opposing views regarding these rule amendments were expressed to CME, CBOT or NYMEX.

CME, CBOT and NYMEX certify that this submission has been concurrently posted on their website at <http://www.cmegroup.com/market-regulation/rule-filings.html>. CME, CBOT and NYMEX further certify that these rule amendments comply with the Commodity Exchange Act and regulations promulgated thereunder.

Should you have any questions regarding this submission, please contact me at (312) 338-2483 or via e-mail at lisa.dunsky@cmegroup.com. Please reference our Submission No. 12-094 in any related correspondence.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Dunsky".

Lisa Dunsky
Director and Associate General Counsel

Exhibit A

CME, CBOT and NYMEX Rule Books

Chapter 9. Clearing Members

Rule 981. ANTI-MONEY LAUNDERING AND ECONOMIC SANCTIONS COMPLIANCE

Each clearing member shall develop and implement a written anti-money laundering compliance program approved in writing by senior management reasonably designed to achieve and monitor the clearing member's compliance with the all applicable requirements of the Bank Secrecy Act (31 U.S.C. § 5311, et seq.), the International Emergency Economic Powers Act (50 U.S.C. § 1701 et seq.) ("IEEPA"), the Trading with the Enemy Act (50 U.S.C. App. § 1 et seq.) ("TWEA"), and the Executive Orders and the implementing regulations issued pursuant thereto, including the regulations issued promulgated thereunder by the U.S. Department of the Treasury and, as applicable, the Commodity Futures Trading Commission. That anti-money laundering compliance program shall, at a minimum,

1. Establish and implement policies, procedures and internal controls reasonably designed to assure compliance with the all applicable provisions of the Bank Secrecy Act, IEEPA, TWEA, and all applicable Executive Orders and regulations issued pursuant thereto ~~the implementing regulations thereunder~~;
2. Provide for independent testing for compliance to be conducted by clearing member personnel or by a qualified outside party;
3. Designate an individual or individuals responsible for implementing and monitoring the day-to-day operations and internal controls of the program; and
4. Provide ongoing training for appropriate personnel.

Clearing members must also supervise and ensure that their guaranteed introducing brokers are in compliance with the ~~anti-money laundering~~ provisions contained in this Rule.