



U.S. COMMODITY FUTURES TRADING COMMISSION

Three Lafayette Centre
1155 21st Street, NW, Washington, DC 20581
Telephone: (202) 418-5000
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Market Participants
Division

Amanda L. Olear
Acting Director

Mr. Steve Solano
Chief Compliance Officer
Ninth Eternity Securities LLC
48 Reservoir Ave.
Chestnut Hill, MA 02467

ssolano@lsconsultinggroup.com

Re: Ninth Eternity Securities LLC Request for Exemption from Filing a Certified Annual Report

Dear Mr. Solano:

By letter dated December 22, 2020 to the Market Participants Division (“the Division”) of the U.S. Commodity Futures Trading Commission (the “Commission”), you request, on behalf of Ninth Eternity Securities LLC (“Ninth Securities”), a registered introducing broker (“IB”), a one-time exemption from filing a certified Form 1-FR-IB for the year ended December 31, 2020. Commission Regulations 1.10(b)(2)(ii) and 1.16 require an IB to file a certified Form 1-FR-IB no later than 90 days after the end of the firm’s fiscal year (and no later than required by regulations of the Securities and Exchange Commission (“SEC”) for an IB dually-registered as a broker or dealer in securities).¹

You request a one-time exemption from filing a certified Form 1-FR-IB for the fiscal year ended December 31, 2020 for Ninth Securities based on your representation that Ninth Securities first became registered as an IB on December 9, 2020. You also represent that Ninth Securities currently has an application for registration as a securities broker-dealer pending with the SEC and the Financial Industry Regulatory Authority. You further represent that Ninth

¹ Commission Regulations may be found at 17 CFR Ch. I, and are available at the Commission’s website, <http://www.cftc.gov>.

Securities is not currently engaged in any activities requiring registration as an IB, and will not commence IB activities until its broker-dealer registration becomes effective.²

In light of the representations made in your letter, the Division believes that granting the request on behalf of Ninth Securities is neither contrary to the purposes of Regulations 1.10(b)(2)(ii) and 1.16 nor the public interest. Accordingly, pursuant to the authority delegated by Regulation 140.91(a)(5) and Regulation 1.16(f)(2), Ninth Securities is hereby granted relief from the certification requirement under Regulation 1.10(b)(2)(ii) with respect to the filing of its Form 1-FR-IB for the fiscal year ending December 31, 2020.

The relief granted in this letter is conditioned on the following: Ninth Securities must include the period from December 9, 2020 through December 31, 2021 in its certified Form 1-FR-IB to be filed for the fiscal year ended December 31, 2021.

This letter, and the exemption granted herein, is based on the representations that have been made to the Division. Any different, changed or omitted facts or conditions might render the exemption void. Moreover, the relief issued by this letter does not excuse persons relying on it from compliance with any other applicable requirements contained in the Commodity Exchange Act or in the Commission regulations issued thereunder. The Division also retains the authority to condition further, modify, suspend, terminate, or otherwise restrict the terms of the relief provided herein in its discretion. If you have any questions regarding this letter, please contact Joshua Beale, Associate Director, at (202) 418-5446.

Very truly yours,

Amanda L. Olear
Acting Director

cc: National Futures Association

² Ninth Securities filed an unaudited Form 1-FR-IB as of December 31, 2020, which showed limited business activity.