



August 7, 2019

Christopher J. Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Cboe Futures Exchange, LLC Rule Certification
Submission Number CFE-2019-015

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and §40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“Commission”) under the Act, Cboe Futures Exchange, LLC (“CFE” or “Exchange”) hereby submits an updated Regulatory Services Agreement (“RSA”) between CFE and National Futures Association (“NFA”) (“Amendment”). The Amendment will become effective August 20, 2019.

A redacted Amendment is included in Exhibit 1 to this rule certification. Concurrent with this submission, CFE has separately submitted to the Commission a supplemental submission to this rule certification. The supplemental submission includes the un-redacted Amendment which has been segregated in Appendix A to the supplemental submission. CFE has also concurrently submitted to the Commission a request for confidential treatment of the un-redacted Amendment with a detailed written justification for the confidential treatment request.

NFA currently provides services to CFE under a regulatory services agreement and acts as a regulatory services provider for CFE under that agreement. The RSA updates and amends the current regulatory services agreement.

CFE believes that the Amendment is consistent with Designated Contract Market Core Principles 2 (Compliance with Rules), 4 (Prevention of Market Disruption), 5 (Position Limitations and Accountability), and 12 (Protection of Markets and Market Participants) under Section 5 of the Act. Among other things, the RSA will assist CFE in meeting its obligations under Core Principle 2 relating to monitoring and enforcing compliance with CFE rules, to detecting and investigating violations of CFE rules, such as CFE rules prohibiting abusive trading practices, and to supervising NFA in its role as regulatory services provider to CFE; under Core Principle 4 relating to evaluating data regarding market activity on CFE in order to seek to detect and prevent manipulation, price distortions, and disruptions to the cash-settlement process; under Core Principle 5 relating to monitoring for adherence to CFE position limit and accountability requirements; and under Core Principle 12 relating to enforcing CFE rules that are designed to promote fair and equitable trading and to protect the market and market participants from abusive practices, including fraudulent, noncompetitive, and unfair actions.

CFE believes that the impact of the Amendment will be beneficial to the public and market participants. CFE is not aware of any substantive opposing views to the Amendment. CFE hereby

certifies that the Amendment complies with the Act and the regulations thereunder. CFE further certifies that it has posted a notice of pending certification with the Commission and a copy of this submission on CFE's Web site (<http://cfe.cboe.com/aboutcfe/rules.aspx>) concurrent with the filing of this submission with the Commission.

Questions regarding this submission may be directed to Arthur Reinstein at (312) 786-7570 or Nicole Gordon at (312) 786-8109. Please reference our submission number CFE-2019-015 in any related correspondence.

Cboe Futures Exchange, LLC

[/s/ Matthew McFarland](#)

By: Matthew McFarland
Managing Director

EXHIBIT 1

Regulatory Services Agreement

[Attachment is Subject to Request for Confidential
Treatment Under Separate Cover]