



July 11, 2024

Submitted via Portal

Mr. Christopher J. Kirkpatrick  
Office of the Secretariat  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581

**Re: CFTC Regulation 40.6(a) Required Certification AEGIS SEF, LLC  
- Exhibit N1a Participant Agreement**

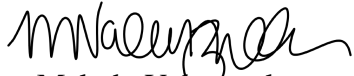
Dear Sir:

Pursuant to Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the “CFTC”, or the “Commission”), AEGIS SEF, LLC (“AEGIS”) hereby notifies the Commission that it has made edits to its Exhibit N1 Participant Agreement to create a NEW Exhibit N1a Participant Agreement for Market Participants only. The Rule Amendments shall become effective 10 days after this submission has been filed or immediately upon approval by the CFTC, whichever occurs first.

A concise explanation and analysis of the rules and their compliance with applicable provisions of the Act, including core principles and the Commission’s regulations, is attached hereto as Exhibit A. A copy of the “Exhibit N1a Participant Agreement” is attached hereto as Exhibit B. A copy of “Exhibit N1 Participant Agreement” is attached hereto as Exhibit C for reference purposes only; no changes were made to the previously submitted Exhibit N1 Participant Agreement and the document will still be used where applicable.

AEGIS hereby certifies that: (i) the amended rule complies with the Act and the Commission’s regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on AEGIS’s website. There were no substantive opposing views to the amendments to the rule.

Please contact the undersigned at 832-431-4217 or [mvalenzuela@aegis-markets.com](mailto:mvalenzuela@aegis-markets.com) with any questions regarding this matter.



Melody Valenzuela  
Vice President - Compliance  
AEGIS SEF, LLC  
2829 Technology Forest Blvd  
Suite 260  
The Woodlands, TX 77381

## Exhibit A – Explanation

Amendment and Explanation	Supporting Rule / Core Principle
<p><b>New Exhibit N1a</b></p> <ul style="list-style-type: none"><li>• Edited Exhibit N1 Participant Agreement to create a NEW condensed version “Exhibit N1a Participant Agreement” for Commercial End User Market Participants who do not have the same obligations as a Financial Counterparty. Removed language specific to Financial Counterparties from Exhibit N1.</li></ul>	<ul style="list-style-type: none"><li>• Core Principle 1(B)- Reasonable Discretion of swap execution facility</li><li>• § 37.202 – Impartial Access</li></ul>

**Exhibit B – Exhibit N1a Participant Agreement for Market Participants**

(attached under separate cover)

**Exhibit C – Exhibit N1 Participant Agreement**

(attached under separate cover)