



October 20, 2025

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-2025-025

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (“Act”), and Regulation 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or “Commission”) under the Act, Cboe Futures Exchange, LLC (“CFE” or “Exchange”) hereby submits a CFE rule amendment (“Amendment”) to implement a Lead Market Maker Program (“LMM Program”) for Cboe Bitcoin Continuous (“PBT”) futures. The Amendment is set forth in a segregated confidential Appendix A to this submission. The Amendment will become effective on or after the first date that it is permitted to become effective pursuant to CFTC Regulation 40.6 based on the date of submission of this filing to the Commission and the length of the current U.S. government shutdown, on a date to be announced by the Exchange through the issuance of an Exchange notice.

Any CFE Trading Privilege Holder (“TPH”) organization or prospective TPH organization may apply to the Exchange for appointment as a lead market maker (“LMM”) under the LMM Program. A prospective TPH organization that is approved as an LMM under the LMM Program may not assume the status of an LMM under the LMM Program unless and until that organization is an effective TPH.

Each LMM application, LMM appointment, and LMM under the Program is specific to a TPH and to one of that TPH’s Executing Firm IDs (“EFIDs”) referred to as an “LMM Program EFID”. Accordingly, a TPH may apply for and receive more than one LMM appointment under the Program, each of which is applicable to that TPH and to a different LMM Program EFID of that TPH. In that case, each of those LMMs is separately subject to the provisions of the Program, including the market performance benchmark and benefit provisions of the Program, as a single LMM.

The Exchange may appoint up to five LMMs under the Program and may limit the number of LMMs appointed under the Program to a number less than five. LMMs are selected by the Exchange under the LMM Program based on the Exchange’s judgment as to which applicants are most qualified to perform the functions of an LMM for PBT futures based on specified criteria.

The LMM Program provides for market performance benchmarks that LMMs must satisfy

and that LMMs must be eligible to receive specified benefits. The market performance benchmarks include parameters with respect to minimum two-sided quote size and maximum quote width. The LMM Program includes market performance benchmarks that are applicable during U.S. trading hours and market performance benchmarks that are applicable during non-U.S. trading hours, as further defined in the LMM Program. The benefits under the LMM Program are intended to attract and retain liquidity providers in PBT futures. Exhibit 1 to this submission includes the description of the LMM Program which CFE will include in Policy and Procedure XXVI of the Policies and Procedures Section of the CFE Rulebook. The Exchange believes that the market performance benchmarks and associated benefits under the LMM Program strike the appropriate balance to incentivize and retain liquidity providers in PBT futures.

The LMM Program expires on September 30, 2026, unless the LMM Program is extended by the Exchange. CFE may determine to extend the term of the LMM Program and LMM appointments under the LMM Program, allow the LMM Program and LMM appointments under the LMM Program to expire, terminate the LMM Program and all LMM appointments under the LMM Program at any time, or amend or replace the LMM Program with a different market maker program at any time. Any of these actions, other than allowing the LMM Program to expire, would be done through a subsequent rule amendment submission to the Commission.

CFE believes that the Amendment is consistent with the Designated Contract Market (“DCM”) Core Principles under Section 5 of the Act. In particular, CFE believes that the Amendment is consistent with DCM Core Principles 2 (Compliance with Rules), 4 (Prevention of Market Disruption), 9 (Execution of Transactions), and 12 (Protection of Markets and Market Participants). CFE notes in this regard that: Each LMM in the LMM Program is obligated by CFE Rule 308 (Consent to Exchange Jurisdiction) to comply with Exchange rules. Each LMM is also required under the terms of the LMM Program to utilize Exchange match trade prevention functionality under CFE Rule 406B (Match Trade Prevention) with respect to trading in PBT futures through its LMM Program EFID. Exchange rules include prohibitions against fraudulent, non-competitive, unfair, and abusive trading practices, and the Exchange will monitor trading in PBT futures for violative activity such as wash trading, manipulative trading, and market abuse. The Exchange believes that the LMM Program will have a positive impact on the price discovery process by fostering improved liquidity, market width and size, and trading volume in PBT futures traded on CFE’s centralized market and by incentivizing market participants to devote their efforts to enhancing market quality in PBT futures. Enhanced market quality benefits all participants in the PBT futures market. Accordingly, 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 website (http://www.cboe.com/us/futures/regulation/rule_filings/cfe/) 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 Rebecca Tenuta at (773) 485-7926. Please reference our submission number CFE-2025-025 in any related correspondence.

Cboe Futures Exchange, LLC

/s/ Troy Yeazel

By: Troy Yeazel
Managing Director

EXHIBIT 1

(Additions are shown in underlined text and
deletions are shown in ~~stricken~~ text)

Cboe Futures Exchange, LLC Policies and Procedures Section of Rulebook

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XXVI. Cboe Bitcoin Continuous Futures Lead Market Maker Program

The Cboe Bitcoin Continuous (“PBT”) Futures Lead Market Maker Program (“Program”) is applicable with respect to PBT futures.

Trading Privilege Holder (“TPH”) organizations and prospective TPH organizations may apply to the Exchange for appointment as a lead market maker (“LMM”) under the Program. A prospective TPH organization that is approved as an LMM under the Program may not assume the status of an LMM under the Program unless and until that organization is an effective TPH.

Each LMM application, LMM appointment, and LMM under the Program is specific to a TPH and to one of that TPH’s Executing Firm IDs (“EFIDs”) referred to as an “LMM Program EFID”. Accordingly, a TPH may apply for and receive more than one LMM appointment under the Program, each of which is applicable to that TPH and to a different LMM Program EFID of that TPH. In that case, each of those LMMs is separately subject to the provisions of the Program, including the market performance benchmark and benefit provisions of the Program, as a single LMM.

The Exchange may appoint up to five LMMs under the Program and may limit the number of LMMs appointed under the Program to a number less than five. Any organization that desires to apply for LMM status under the Program should submit an application in a form and manner prescribed by the Exchange.

LMMs shall be selected by the Exchange based on the Exchange’s judgment as to which applicants are most qualified to perform the functions of an LMM under the Program. Factors to be considered in making this selection may include, but are not limited to, satisfaction of the qualifications listed below as well as any one or more of the factors listed in Rule 515(b), as applied to LMM applicants instead of with respect to DPM applicants.

The following describes the qualifications, requirements, market performance benchmarks, benefits, and appointment term under the Program unless otherwise specified.

Qualifications

- Ability to automatically and systematically provide two-sided markets for PBT futures.

Requirements

- Each LMM shall designate in advance to the Exchange an LMM Program EFID. An LMM Program EFID is a single EFID through which the LMM will provide Orders to satisfy the market performance benchmarks under the Program. The LMM Program EFID designated

by an LMM must be an EFID assigned to that TPH and may not be an EFID of another TPH. An LMM shall inform the Exchange in advance if the LMM determines to change its LMM Program EFID.

- Each LMM is required to utilize Exchange match trade prevention functionality under Rule 406B with respect to trading in PBT futures through its LMM Program EFID.

Market Performance Benchmarks

- Each LMM shall provide Orders in PBT futures in conformity with specified criteria relating to minimum two-sided quote size and maximum quote width and be eligible to receive specified benefits. Certain of these criteria apply during U.S. Trading Hours for PBT futures and certain of these criteria apply during Non-U.S. Trading Hours for PBT futures.
- For purposes of the Program:
 - U.S. Trading Hours are any regular trading hours for a PBT futures Contract on a trading day and any extended trading hours for a PBT futures Contract on a trading day between 3:00 p.m. Chicago time and 4:00 p.m. Chicago time. U.S. Trading Hours for a PBT futures Contract on a normal trading day are from 8:30 a.m. Chicago time to 4:00 p.m. Chicago time. U.S. Trading Hours for a PBT futures Contract shall be less than this entire time frame on its expiration date or on a trading day with shortened trading hours.
 - Non-U.S. Trading Hours are any extended trading hours for a PBT futures Contract on a trading day other than any extended trading hours for a PBT futures Contract on that trading day between 3:00 p.m. Chicago time and 4:00 p.m. Chicago time. Non-U.S. Trading Hours for a PBT futures Contract on a normal trading day are from 5:00 p.m. Chicago time on the prior calendar day to 8:30 a.m. Chicago time on the calendar day that is the same as the trading day.
- The Exchange may terminate, place conditions upon, or otherwise limit a TPH's appointment as an LMM under the Program if the TPH fails to satisfy the market performance benchmarks under the Program for both U.S. Trading Hours and Non-U.S. Trading Hours. However, failure of a TPH to satisfy market performance benchmarks under the Program shall not be deemed a violation of Exchange rules.

Benefits

- An LMM is eligible to receive specified benefits in connection with acting as an LMM under the Program.

Term

- The Program and each LMM appointment under the Program will expire on September 30, 2026. The Exchange may determine to extend the term of the Program and LMM appointments under the Program, allow the Program and LMM appointments under the Program to expire, terminate the Program and all LMM appointments under the Program at any time, or amend or replace the Program with a different market maker program at any

time.

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