

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

October 25, 2022

Terrence A. Duffy Chief Executive Officer CME Group Inc. 20 South Wacker Drive Chicago, Illinois 60606

Re: CME Group Inc.

Definitive Proxy Statement on Schedule 14A

Filed March 17, 2022

File No. 001-31553

Dear Terrence A. Duffy:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance Disclosure Review Program