



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3233

May 2, 2018

Via E-mail

Mr. Brian N. Schell  
Chief Financial Officer  
CBOE Global Markets, Inc.  
400 South LaSalle Street,  
Chicago, IL 60605

**Re: CBOE Global Markets, Inc.**  
**Form 10-K for the fiscal year ended December 31, 2017**  
**Filed February 22, 2018**  
**File No. 1-34774**

Dear Mr. Schell:

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,

/s/ Shannon Sobotka

Shannon Sobotka  
Staff Accountant  
Office of Real Estate and  
Commodities