



October 1, 2024

**Via Federal Express**

Mrs. Jeanette Jackson  
Securities and Exchange Commission  
Division of Trading and Markets  
100 F Street, N.E.  
Mail Stop 6628  
Washington, DC 20549-0001

Re: ***Cboe Exchange, Inc.  
Form 1 Amendment***

Dear Mrs. Jackson:

On behalf of Cboe Exchange, Inc. (the "Exchange"), and in connection with the Cboe Form 1 that is on file with the Securities and Exchange Commission ("Commission"), enclosed please find one original and two copies of the Execution Page to Form 1 as well as the following exhibit<sup>1</sup>:

- Exhibit F (updated to include the most recent, final versions of agreements circulated to Members and other Users of the Exchange);

This amendment is filed in accordance with SEC Rule 6a-2 and is intended to replace Exhibit F currently on file with the Commission. Please do not hesitate to contact me if you have any questions or require anything further.

Sincerely,

A handwritten signature in cursive script that reads "Kyle Murray".

Kyle Murray  
VP, Legal Head of Global Listings  
913-815-7121  
Signature executed at 9:00am on 10/01/24

Enclosure

**Attachment**


---

<sup>1</sup> See Attachment for a comprehensive list of updates to Exhibit F

*Summary of changes made to Exhibit F:*

- Updated  
Taiwanese TPH Supplemental Application Form  
Off-Floor DPM Appointment Application
  - Added  
Gujarat International Finance Tec-City (“GIFT” City) Trading Permit Holder Supplemental Application Form
-

**\*Based upon relief from the Commission staff and difficulties arising from COVID-19, we are making this filing without notarization. This document has been signed electronically.**

Form I Page 1 Execution Page	<b>U.S. SECURITIES AND EXCHANGE COMMISSION</b> <b>WASHINGTON, D.C. 20549</b>  <b>APPLICATION FOR, AND AMENDMENTS TO APPLICATION</b> <b>FOR, REGISTRATION AS A NATIONAL SECURITIES EXCHANGE</b> <b>OR EXEMPTION FROM REGISTRATION PURSUANT TO</b> <b>SECTION 5 OF THE EXCHANGE ACT</b>	Date filed (MM/DD/YY)  <b>10/01/24</b>	OFFICIAL USE ONLY
<p>WARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of the applicant would violate the federal securities laws and may result in disciplinary, administrative or criminal action.</p>			
<b>INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS</b>			
<p><input type="checkbox"/> APPLICATION <span style="margin-left: 200px;"><input checked="" type="checkbox"/> AMENDMENT</span></p>			
<p>1. State the name of the applicant: <u>Cboe Exchange, Inc.</u></p>			
<p>2. Provide the applicant's primary street address (Do not use a P.O. Box):  <u>433 W Van Buren Steet</u>  <u>Chicago, Illinois 60661</u> <span style="float: right;"> 24003443</span></p>			
<p>3. Provide the applicant's mailing address (if different):          _____          _____</p>			
<p>4. Provide the business telephone and facsimile number:  <u>(913) 815-7000</u> <span style="margin-left: 150px;"><u>(913) 815-7119</u></span>          (Telephone) <span style="margin-left: 150px;">(Facsimile)</span></p>			
<p>5. Provide the name, title and telephone number of a contact employee:  <u>Kyle Murray</u> <span style="margin-left: 20px;"><u>VP, Legal Head of Global Listings</u></span> <span style="margin-left: 20px;"><u>Cboe Exchange, Inc.</u></span> <span style="margin-left: 20px;"><u>(913) 815-7121</u></span>          (Name) <span style="margin-left: 100px;">(Title)</span> <span style="margin-left: 100px;">(Telephone Number)</span></p>			
<p>6. Provide the name and address of counsel for the applicant:  <u>Pat Sexton</u>  <u>433 W Van Buren Street</u>  <u>Chicago, IL 60661</u></p>			
<p>7. Provide the date that applicant's fiscal year ends: <u>December 31</u></p>			
<p>8. Indicate legal status of the applicant: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Partnership <input type="checkbox"/> Partnership  <input type="checkbox"/> Limited Liability Company <input type="checkbox"/> Other (specify): _____</p> <p>If other than a sole proprietor, indicate the date and place where applicant obtained its legal status (e.g. state where incorporated, place where partnership agreement was filed or where applicant entity was formed):          (a) Date (MM/DD/YY): <u>11/01/07</u> (b) State/Country of formation: <u>Delaware/United States of America</u>          (c) Statute under which applicant was organized: <u>General Corporation Law of the State of Delaware</u></p>			
<p><b>EXECUTION:</b>          The applicant consents that service of any civil action brought by, or notice of any proceeding before, the Securities and Exchange Commission in connection with the applicant's activities may be given by registered or certified mail or confirmed telegram to the applicant's contact employee at the main address, or mailing address if different, given in Items 2 and 3. The undersigned, being first duly sworn, deposes and says that he/she has executed this form on behalf of, and with the authority of, said applicant. The undersigned and applicant represent that the information and statement contained herein, including exhibits, schedules, or other documents attached hereto, and other information filed herewith, all of which are made a part hereof, are current, true and complete.</p>			
<p>Date: <u>10/01/24</u> <span style="margin-left: 150px;"><u>Cboe Exchange, Inc.</u></span>          (MM/DD/YY) <span style="margin-left: 150px;">(Name of Applicant)</span></p>			
<p>By: <u>Kyle Murray</u> [signature executed at 4:00pm on 10/01/24] <span style="margin-left: 50px;"><u>Kyle Murray, VP, Legal Head of Global Listings</u></span>          (Signature) <span style="margin-left: 100px;">(Printed Name and Title)</span></p>			
<p>Subscribed and sworn before me this <u>see header</u> day of <u>see header</u>, <u>see header</u> by <u>see header</u>          (Month) <span style="margin-left: 50px;">(Year)</span> <span style="margin-left: 50px;">(Notary Public)</span></p>			
<p>My Commission expires <u>see header</u> County of <u>see header</u> State of <u>see header</u></p>			
<p><b>This page must always be completed in full with original, manual signature and notarization.</b>  <b>Affix notary stamp or seal where applicable.</b></p>			

**Exhibit F**

**Exhibit Request:**

A complete set of all forms pertaining to:

1. Application for membership, participation or subscription to the entity,
2. Application for approval as a person associated with a member, participant or subscriber of the entity; and
3. Any other similar materials.

**Response:**

Attached please find the following documents which have recently been added or updated:

1. Taiwanese Trading Permit Holder Supplemental Application Form | Updates: Added new products for stocks and ETFs. Updated font to comply with corporate branding standards.
2. Off Floor Designated Primary Market Maker (DPM) Appointment Application | Updates: Added language to clarify Responsible Person and DPM designee. Updated font to comply with corporate branding standards.

**Cboe Exchange, Inc.**  
**Taiwanese Trading Permit Holder**  
**Supplemental Application Form**

---

The business organization referenced below (“Organization”) certifies the following to Cboe Exchange, Inc. (“Cboe Options”):

The Organization is either a Futures Commission Merchant (“FCM”) or a registered broker-dealer as defined under Taiwanese law and satisfies the applicable requirements for designation as either an FCM or registered broker-dealer.

The Organization will comply with the Taiwan Personal Data Protection Act (“PDPA”) and will provide notification to and obtain the consent from individual customers to ensure that: (i) the individual customers’ personal data may be provided to Cboe Options; and (ii) the use by and provision of personal data to Cboe Options is within the scope of the customers’ consent or notice to the customer, as applicable.

Under Cboe Options Rule 3.5, each individual Trading Permit Holder (“TPH”) must be domiciled in or each TPH organization must be organized under the laws of a jurisdiction expressly approved by Cboe Options, and will be subject to the jurisdiction of the federal courts of the United States and the courts of Illinois. Additionally, approval of a Taiwanese TPH is contingent upon the condition that the TPH does not trade in any Cboe Options product other than the Cboe Options products that have been expressly authorized for trading in Taiwan. Any violation of this condition will be considered a violation of Cboe Options’ rules. The Organization certifies to Cboe Options that it will only enter orders and execute transactions on Cboe Options in Cboe Options products approved for trading in Taiwan and not in any other Cboe Options products. A list of Cboe Options products that are approved for trading in Taiwan is attached.

\_\_\_\_\_  
Trading Permit Holder (“TPH”) Name

\_\_\_\_\_  
Signature of Authorized Officer, Partner or  
Managing Member of TPH

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

**Cboe Exchange, Inc.**  
**Taiwanese Trading Permit Holder**  
**Supplemental Application Form**  
**Attachment – List of Cboe Options Products**  
**Approved for Trading in Taiwan**  
(as of September 12, 2024)

---

Options on the following stocks, exchange-traded products, and indexes (with options trading symbol) are currently approved for trading in Taiwan:

Stocks

Adobe Systems Inc.

Advanced Micro Devices Inc.

Amazon Com Inc.

American Express Company

American International Group Inc.

Amgen Inc.

Anadarko Petroleum Corporation

Analog Devices, Inc.

APA Corp

Apple Inc. Com Stk

Applied Materials Inc.

Arconic Inc.

AT&T Inc. Com

Bank of America Corp.

Best Buy Company Inc.

Biogen Idec Inc.

Blackberry Limited

Blucora Inc.

Booking Holdings Inc.

Boston Scientific Corporation

Bristol Myers Squibb Company

Brocade Communications Systems Inc.

Calpine Corporation

Check Point Software Technologies Ltd.

Ciena Corporation Com New

Cirrus Logic Inc.

Cisco Systems, Inc.

Citigroup  
Citrix Systems Inc.  
Clear Channel Outdoor Holdings Inc.  
Coca-Cola Company  
Coinbase Global, Inc.  
Corning Incorporated  
Cypress Semiconductor Corporation  
Danaher Corporation  
Eastman Kodak Company  
eBay Inc.  
EchoStar Corporation  
Eli Lilly & Company  
EOG Resources Inc.  
Ericsson  
Exxon Mobil Corporation  
FLEX LTD.  
Ford Motor Company  
Gap Inc.  
General Electric Company  
General Motors Company  
Goldman Sachs Group Inc.  
Halliburton Company (holding company)  
Home Depot Inc.  
Honeywell International Inc.  
HP Inc.  
Integrated Device Technology Inc.  
Intel Corporation  
International Paper Co.  
Intuit Com  
Jabil Circuit Inc.  
Johnson & Johnson  
JPMorgan Chase & Company Com Stk  
Juniper Networks Inc.  
Kohl's Corporation  
Level 3 Communications Inc.

McDonald's Corporation  
Medtronic Inc.  
Merck & Co. Inc.  
Meta Platforms, Inc.  
Micron Technology Inc.  
Microsoft Corporation  
MicroStrategy Incorporated  
Motorola Solutions Inc.  
Nvidia Corporation  
Oracle Corporation  
Palantir Technologies Inc.  
PepsiCo Inc.  
Pfizer Inc.  
Procter & Gamble Co.  
Qorvo, Inc.  
Qualcomm Inc.  
Rambus Inc.  
Rite Aid Corporation  
Schlumberger Ltd.  
Schwab Charles Corporation  
Shopify Inc.  
Sonus Networks Inc.  
Spotify Technology S.A.  
Starbucks Corporation  
Super Micro Computer, Inc.  
Texas Instruments Inc.  
T-Mobile US, Inc.  
Uber Technologies, Inc.  
United Parcel Service, Inc.  
Verisign Inc.  
Verizon Communications  
Vertiv Holdings Co.  
Viavi Solutions Inc.  
Vodafone Group PLC  
Wal-Mart Stores, Inc.



Williams Companies

Xerox Corporation

Yahoo Inc.

### Exchange-Traded Products

Consumer Discretionary Select Sector SPDR

Energy Select Sector SPDR

Financial Select Sector SPDR

iShares 20+ Year Treasury Bond

iShares 7-10 Year Treasury Bond ETF

iShares MSCI Emerging Markets

iShares MSCI Japan ETF

iShares Biotechnology

iShares iBoxx \$ High Yield Corporate Bond ETF

iShares iBoxx \$ Investment Grade Corporate Bond ETF

iShares Russell 2000

iShares U.S. Real Estate ETF

ProShares UltraPro Short QQQ

ProShares UltraPro QQQ

Vaneck Vectors Biotech

Vaneck Vectors Oil Services

Vaneck Vectors Semiconductor

Materials Select Sector SPDR

SPDR Dow Jones Industrial Average ETF Trust

SPDR S&P 500 ETF Trust

### Index

Cboe Volatility Index

Dow Jones Industrial Average Index

Mini-NDX Index

NASDAQ 100 Index

Russell 2000 Index

S&P 100 Index

S&P 500 Index (SPXW and FLEX options included)

Mini-S&P 500 Index

**Cboe Exchange, Inc.**  
**Off-Floor Designated Primary Market-Maker (DPM)**  
**Appointment Application**

APPLICANT DATA		
Name of TPH Organization:		
Address:		
City:	State:	Zip:
Phone:	Firm CRD #:	

DPM RESPONSIBLE PERSON(S) INFORMATION		
<p>Please identify at least one Responsible Person who will be staffing the Off-Floor DPM operation on a day-to-day basis (i.e. the person(s) who will set quotes and sizes, monitor trading activity, be available on a real-time basis to resolve trading disputes, etc.) for the Off-Floor DPM applicant TPH Organization ("Applicant"). Each Responsible Person must be TP (24) registered in WebCRD. Describe in detail, all industry experience as well as the relevant trading experience for each responsible person. All fields must be completed.</p> <p>Pursuant to Rule 3.54, the applicant (i) authorizes the individual(s) listed below to enter into Exchange transactions on behalf of the Applicant in its capacity as a DPM; (ii) authorizes the individual(s) to represent the Applicant in all matters relating to the fulfillment of the Applicant's responsibilities as a DPM; and (iii) guarantees all obligations arising out of the individual's representation of the Applicant in its capacity as a DPM in all matters relating to the Exchange.</p>		
RESPONSIBLE PERSON #1		
Name:	CRD #:	NFA ID:
Title:	Business Phone:	
Email:	Mobile Phone:	
Experience:		

RESPONSIBLE PERSON #2		
Name:	CRD #:	NFA ID:
Title:	Business Phone:	
Email:	Mobile Phone:	
Experience:		

**OFF-FLOOR DPM DESIGNEE INFORMATION (Optional)**

Please identify any Off-Floor DPM Designee(s) who will be involved in the day-to-day trading of the DPM appointed classes for the Applicant. Describe in detail, all industry experience as well as the relevant trading experience for each designee. All fields must be completed.

Pursuant to Rule 3.54, the applicant (i) authorizes the individual(s) listed below to enter into Exchange transactions on behalf of the Applicant in its capacity as a DPM; (ii) authorizes the individual(s) to represent the Applicant in all matters relating to the fulfillment of the Applicant's responsibilities as a DPM; and (iii) guarantees all obligations arising out of the individual's representation of the Applicant in its capacity as a DPM in all matters relating to the Exchange.

**OFF-FLOOR DPM DESIGNEE #1**

Name:	CRD #:	NFA ID:
Title:	Business Phone:	
Email:	Mobile Phone:	
Experience:		

**OFF-FLOOR DPM DESIGNEE #2**

Name:	CRD #:	NFA ID:
Title:	Business Phone:	
Email:	Mobile Phone:	
Experience:		

**APPLICANT INFORMATION**

Identify the owners, partners, members, and Responsible Person(s) of the Applicant as follows:

Names of Owners, Partners, Members, Responsible Persons	Title or Status	\$ Capital Contribution	% Profit	% Loss


**APPLICANT INFORMATION**

Please list those owners, partners, principals and any Responsible Person(s) of the Applicant who are affiliated in any way with another DPM organization. Include the extent of the affiliation, including amounts of capital contributions, % profits, % losses, voting rights etc. List any additional information below.

Name	Title or Status	Affiliated Organization	\$ Capital Contribution	% Profit/Losses	Voting Rights

**ADDITIONAL INFORMATION**

Note any disciplinary or remedial action taken against any individual or organization named in this application other than action taken pursuant to an SRO minor rule violation plan. If any disciplinary or remedial action has been taken, describe in detail the circumstances surrounding each action and identify the issuing SRO or governmental agency. Also note and describe any warnings issued to any individual or organization named in this application related to a capital or operational problem, rules of trading procedure or evaluation of market quality and identify the issuing SRO or Governmental agency.

**TRADING HISTORY**

Please describe the industry experience of the Applicant. Describe the firms experience in both floor-based and electronic environments.

**PAST SUCCESS IN MARKET MAKING**

Please describe, in detail, the methods used by the Applicant to attract order flow and indicate the Applicant's past success in this regard. Give specific data on the Applicant's track record with regard to increasing volume and market share in classes where it was granted a specialist or specialist-like appointment.

**MARKET SERVICE**

Describe the methods that the Applicant organization commits to employ that will provide the greatest results in attracting order flow to Cboe Options. Responses should be specific with respect to the following: Commitment in terms of personnel and dollars to marketing efforts; participation in the Exchange's Payment For Order Flow program, and promotion of Cboe Options as the marketplace of choice. Additionally, please describe how the Applicant intends to promote and manage customer relations including responding to individual requests from customers, problem resolution and ongoing customer service support.

#### MARKET QUALITY

Describe the level of market quality that the Applicant will maintain in order be competitive with other marketplaces as well as with other Cboe Options TPHs who are making markets in the same class(es). Specifically, note commitments to bid-ask spread differentials, firmness, size and depth of markets, and number and frequency of quotes.

#### OPERATIONAL CONSIDERATIONS

Please describe any special technology that the Applicant will use in support of an Off-Floor DPM appointment, including primary autoquote system and backup system(s). Please note the levels of electronic capacity, stability and reliability of your autoquote system and backup system(s).

Describe how the Applicant intends to promote and manage customer relations and ensure that the Off-Floor DPM operation is continuously operated by approved and experienced responsible persons and/or additional DPM Designees. Please include the name(s) and contact information of each responsible person who will be available at least ½ hour prior to the open and 1 hour following the close, as well as throughout the trading day, to respond to customer complaints and/or inquiries.

If approved as an Off-Floor DPM, please indicate if the Applicant intends to have a Nominee trade in open outcry in the option classes allocated to the Applicant in its capacity as an Off-Floor DPM. Please include the name(s) and contact information of each Nominee that will be stationed on the trading floor.

#### ORDER FLOW DEDICATION

Given Cboe Options' dedication to filling its customers' orders at the best available price (NBBO), describe the Applicant's commitment to providing the NBBO to all customers including those customers' orders resulting from the Applicant's captive order flow (or order flow garnered as part of your organization's brokerage operation).

CAPITAL

Note the financial resources that the Applicant proposes to commit. Provide details such as: The specific dollar amount; the name(s) of the source(s); whether or not the source(s) has any management responsibility or participates in the profits/losses of the operation and to what extent the source(s) participates in management and/or profits/losses. If the money is borrowed, note the repayment schedule. Provide any other related information that should be considered by the Exchange.

MISCELLANEOUS

Note any additional information which the Applicant deems pertinent to this application.

I have carefully read the questions contained on this application and the responses that have been provided to those questions. On behalf of the Off-Floor DPM applicant TPH Organization, I represent that the responses provided and any other information provided to Cboe Options on behalf of the Off-Floor DPM applicant TPH Organization in connection with this application is current, accurate, and complete.

\_\_\_\_\_  
Signature of Authorized Officer, Partner or  
Managing Member of TPH

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title



**Exhibit F**

**Exhibit Request:**

A complete set of all forms pertaining to:

1. Application for membership, participation or subscription to the entity,
2. Application for approval as a person associated with a member, participant or subscriber of the entity; and
3. Any other similar materials.

**Response:**

Attached please find the following documents which have recently been added or updated:

1. Gujarat International Finance Tec-City (“GIFT” City) Trading Permit Holder Supplemental Application Form | New Document

**Cboe Exchange, Inc.**  
**Gujarat International Finance Tec-City (“GIFT” City)**  
**Trading Permit Holder**  
**Supplemental Application Form**

---

The business organization referenced below (“Organization”) represents and warrants to Cboe Exchange, Inc. (“Cboe Options”) that as of the date of the Organization’s application for a Trading Permit and on each day thereafter until the Organization’s Trading Permit is terminated:

- The Organization is located in GIFT City and is registered with the International Financial Services Centre Authority (“IFSCA”).
  
- The Organization represents and warrants that it is permitted to become a Trading Permit Holder of and participate on Cboe Options under the regulatory framework governing the Organization.

\_\_\_\_\_  
Name of Organization

\_\_\_\_\_  
Signature of Authorized Signatory

\_\_\_\_\_  
Name of Authorized Signatory

\_\_\_\_\_  
Title of Authorized Signatory

\_\_\_\_\_  
Date