



February 26, 2026

Division of Trading and Markets
Office of Market Supervision
Securities and Exchange Commission
100 F. Street, N.E.
Washington, D.C. 20549

**RE: MIAx Sapphire, LLC ("SAPPHIRE")
Amendment 2026-4 to Form 1 Application**

Dear Sir/Madam:

Enclosed for official filing pursuant to Rule 6a-2(a) is Amendment 2026-4 to the Form 1 Application of SAPPHIRE, which includes the following changes:

Exhibit J – Updated director business information

Please do not hesitate to contact me if you have any questions in connection with this matter.

Sincerely,

A handwritten signature in black ink that reads "Barbara J. Comly". The signature is written in a cursive, flowing style.

Barbara J. Comly
EVP, General Counsel & Corporate Secretary

Enclosure
cc: Marlene Olsen

| | | | |
|---------------------------------------|--|---|-------------------------|
| Form 1 Page 1 Execution Page | UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549 APPLICATION FOR, AND AMENDMENTS TO APPLICATION FOR, REGISTRATION AS A NATIONAL SECURITIES EXCHANGE OR EXEMPTION FROM REGISTRATION PURSUANT TO SECTION 5 OF THE EXCHANGE ACT | Date filed (MM/DD/YY): 02/26/26 | OFFICIAL USE ONLY |
|---------------------------------------|--|---|-------------------------|

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 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

INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS

APPLICATION AMENDMENT

1. State the name of the applicant: MIAX Sapphire, LLC
2. Provide the applicant's primary street address: 7 Roszel Road, Suite 1A, Princeton, NJ 08540
3. Provide the applicant's mailing address (if different):
4. Provide the applicant's business telephone and facsimile number:
Telephone: 609-897-7300; Facsimile: 609-987-2210



5. Provide the name, title and telephone number of a contact employee:
Barbara J. Comly, EVP, General Counsel & Corporate Secretary
609-897-7315

26000090

6. Provide the name and address of counsel for the applicant:
Barbara J. Comly, EVP, General Counsel & Corporate Secretary
MIAX Sapphire, LLC
7 Roszel Road, Suite 1A
Princeton, NJ 08540

7. Provide the date applicant's fiscal year ends: December 31

8. Indicate legal status of applicant: Corporation Sole Proprietorship Partnership
 Limited Liability Company Other (specify):

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):

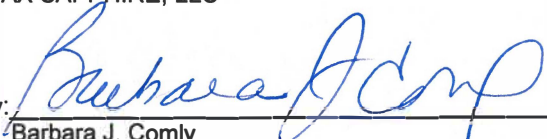
(a) Date (MM/DD/YY): 04/06/23 (b) State/Country of formation: Delaware

(c) Statute under which applicant was organized: Delaware Limited Liability Company Act (6 Del. C. § 18-101, et seq.)

EXECUTION: 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 statements 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.

MIAX SAPPHERE, LLC

Date: February 26, 2026

By: 
Barbara J. Comly
EVP, General Counsel & Corporate Secretary

Subscribed and sworn before me this 26th day of February, 2026.

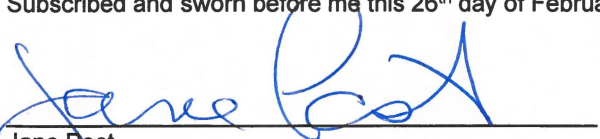

Jane Post
Notary Public of the State of New Jersey
My Commission Expires October 27, 2029



EXHIBIT J

Exhibit Request:

A list of the officers, governors, members of all standing committees, or persons performing similar Exhibit J functions, who presently hold or have held their offices or positions during the previous year, indicating the following for each:

1. Name.
2. Title.
3. Dates of commencement and termination of term of office or position.
4. Type of business in which each is primarily engaged (e.g., floor broker, specialist, odd lot dealer, etc.).

Response:

1. Officers of MIAX Sapphire, LLC

| Name | Title |
|-------------------------|--|
| Thomas P. Gallagher | Chairman and Chief Executive Officer/President |
| Douglas M. Schafer Jr. | Chief Information Officer and Executive Vice President |
| Barbara Comly | Executive Vice President, General Counsel and Corporate Secretary |
| Lance Emmons | Executive Vice President and Chief Financial Officer/Treasurer |
| Joseph S. Bracco | Executive Vice President – Global Head of Sales |
| Shelly Brown | Executive Vice President – Chief Strategy Officer |
| Edward Deitzel | Executive Vice President, Chief Regulatory Officer and Chief Compliance Officer |
| Randy Foster | Executive Vice President – Business Systems Development |
| Harish Jayabalan | Executive Vice President – Chief Risk Officer and Chief Information Security Officer |
| Matthew Rotella | Executive Vice President – Chief Technology Officer |
| John Smollen | Executive Vice President – New Product Development |
| Kelli Annequin | Senior Vice President – Chief Marketing Officer |
| Charles Blades | Senior Vice President – Controller |
| Deborah Carroll | Senior Vice President – Associate General Counsel and Assistant Corporate Secretary |
| Joseph W. Ferraro III | Senior Vice President – Deputy General Counsel |
| Rodney Hester | Senior Vice President – Systems Infrastructure |
| Amy Neiley-Avayou | Senior Vice President – Trading Operations and Listings |
| Paul Anders (Andy) Nybo | Senior Vice President – Chief Communications Officer |
| Vinay Rao | Senior Vice President – Trading Systems Development |
| Siddharth Sahoo | Senior Vice President – Trading Systems Development |
| Todd Borneman | Vice President – Data Services |
| Kateryna Brezitska | Vice President – Systems Requirements and Analysis |
| Daniel Brill | Vice President – Systems Requirements |

| Name | Title |
|---------------------------|--|
| Liang Cao | Vice President – Business Systems Development |
| Christopher Chapman | Vice President – Strategic Planning & Business Development |
| Neil Collins | Vice President – Regulatory Operations |
| Jonathan S. Dowd | Vice President – Systems Requirements |
| Mitchell Garfinkel | Vice President – Finance |
| Carlo Giansanti | Vice President – Vendor Management |
| Daniel Hsu | Vice President – Exchange Pricing & Business Analysis |
| Joseph P. Kamnik | Senior Vice President – Senior Counsel |
| Gamini Karunaratne | Vice President – Network Engineering & Data Center Operations |
| Ronald Miller | Vice President – Compliance |
| Brendan Murphy | Vice President – Member Relations and Development |
| James O'Neil | Vice President and Director of Physical Security and Safety |
| Gerard (Chaz) Palmeri | Vice President – Systems Operations |
| Dominique Prunetti Miller | Vice President – Human Resources and Corporate Relations |
| Priya Rege | Vice President – Business Systems Development |
| Christopher Solgan | Vice President – Senior Counsel |
| Christopher Swisher | Vice President – Market Surveillance |
| Tia Toms | Vice President – Administration |
| Bruce Ulriksen | Vice President – Regulatory Operations, Trading Floor Oversight |
| Gregory Ziegler | Vice President – Senior Counsel |
| Nathan Gaudio | Assistant Vice President – Strategic Planning & Business Development |
| Tatiana Kitaigorovski | Assistant Vice President – Associate Counsel |
| Tao Pan | Assistant Vice President – Associate Counsel |
| Ketan Patel | Assistant Vice President – Information Security |
| Zachary G. Pendleton | Assistant Vice President – Privacy and Data Governance Counsel |
| Gagan Singh | Assistant Vice President – Business Systems Development |
| Michael Slade | Assistant Vice President – Associate Counsel |

The officers of the Exchange serve until their successors are appointed in accordance with the By-Laws of the Exchange. Officers of the Exchange serve at the direction of the Board of Directors.

2. **Directors of MIAX Sapphire, LLC**

| Name | Classification | Term of Office | Type of Business |
|------------------------|-----------------------------------|-------------------------------|--|
| Thomas P. Gallagher | Industry | So long as CEO of the Company | Securities Exchange |
| William T. Bergman | Non-Industry/ Independent | Class II – 2026 | Board Chairman – City of Philadelphia – Zoning Hearing Board |
| Lindsay L. Burbage | Non-Industry/ Independent | Class II – 2026 | Attorney (Retired) |
| Michael Gorczowski | Industry/Member Representative | Class II – 2026 | Partner – Wolverine Holdings LP |
| John E. McCormac | Non-Industry/ Independent | Class II – 2026 | Township Mayor – Woodbridge, New Jersey; Former New Jersey State Treasurer |
| Michael P. Ameen | Non-Industry/ Independent | Class III – 2027 | Executive Vice President and Chief Financial Officer – Rheo Vest, LLC |
| Leslie Florio | Non-Industry/ Independent | Class III – 2027 | Community Volunteer |
| William V. Looney, Jr. | Industry/Member Representative | Class III – 2027 | Formerly with X-Change Financial Access, LLC |
| Kenneth Lozier | Non-Industry/ Independent | Class III – 2027 | Attorney |
| Brendan Culligan | Industry/Member Representative | Class I – 2028 | Trader – Jane Street |
| Marianne Deane | Non-Industry/ Independent | Class I – 2028 | Community Volunteer |
| Kurt M. Eckert | Non-Industry | Class I – 2028 | Former Partner and Head of Market Structure – Wolverine Trading, LLC |
| Robert D. Prunetti | Non-Industry | Class I – 2028 | President – Phoenix Ventures, LLC |

3. **Committees of MIAX Sapphire, LLC**

| APPEALS COMMITTEE | |
|--------------------------|--------------------------------|
| Name | Classification |
| Marianne Deane (Chair) | Non-Industry/Independent |
| Brendan Culligan | Industry/Member Representative |
| Michael Gorczowski | Industry/Member Representative |

| AUDIT COMMITTEE | |
|----------------------------|--------------------------|
| Name | Classification |
| Robert D. Prunetti (Chair) | Non-Industry |
| Michael P. Ameen | Non-Industry/Independent |
| John E. McCormac | Non-Industry/Independent |

| REGULATORY OVERSIGHT COMMITTEE | |
|---------------------------------------|--------------------------|
| Name | Classification |
| Lindsay L. Burbage (Chair) | Non-Industry/Independent |
| Leslie Florio | Non-Industry/Independent |
| Kenneth Lozier | Non-Industry/Independent |

| TECHNOLOGY COMMITTEE | |
|-----------------------------|--------------------------|
| Name | Classification |
| Leslie Florio (Chair) | Non-Industry/Independent |
| Marianne Deane | Non-Industry/Independent |
| John E. McCormac | Non-Industry/Independent |