

EXHIBIT 5A

(additions are underlined; deletions are [bracketed])

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Rules of Cboe Exchange, Inc.

(currently effective)

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[Rule 6.67. Cboe Trade Match System

General. The Cboe Trade Match System (“CTM”) is a system in which authorized Trading Permit Holders may add and/or update trade records. CTM may be used to enter and report transactions that have been effected on the Exchange in accordance with the Exchange’s rules, to update information entered pursuant to Rule 6.51, Interpretation and Policy .04, or to correct certain bona fide errors. The Exchange will announce documentation requirements related to changes made through the use of CTM via a Regulatory Circular.

(a) Fields that may be changed through the use of CTM without notice to the Exchange include the following: (1) Executing Firm and Contra Firm; (2) Executing Broker and Contra Broker; (3) CMTA; (4) Market Maker Account and Sub Account; (5) Customer ID; (6) Position Effect (open/close); (7) Optional data and/or (8) Origin Code (provided the change is not from a customer origin code (C) to any other origin code).

(b) Fields that may be changed through the use of CTM that require notification to the Exchange include the following: (1) Series, (2) Quantity, (3) Buy or Sell; (4) Premium Price and/or (5) Origin Code (if changing origin code from customer (C) to any other origin code). Notification of the change shall be made as soon as practicable, but no later than fifteen (15) minutes after the change has been made.

(c) Changes related to the give up of a Clearing Trading Permit Holder (“Give Up”) through the use of CTM shall be governed by Rule 6.21.

. . . Interpretations and Policies:

.01 Any actions taken by the Exchange pursuant to this Rule 6.67(b) or (c) do not constitute a determination by the Exchange that the transaction was effected in conformity with the requirements of Exchange rules. Any improper change made through CTM shall be processed and given effect, but would be subject to appropriate disciplinary action in accordance with the Rules of the Exchange. In addition, nothing in this Rule is intended to define or limit the ability of the Exchange to sanction or take other remedial action pursuant to other Exchange rules for rule violations or other activity for which remedial measures may be imposed.]

EXHIBIT 5B

(additions are underlined; deletions are [bracketed])

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Rules of Cboe Exchange, Inc.

(effective October 7, 2019)

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Rule 6.6. Clearing Editor

(a) The Clearing Editor allows Trading Permit Holders to update executed trades on their trading date and revise them for clearing. The Clearing Editor may be used to update certain information entered pursuant to Rule 6.1 or to correct certain bona fide errors.

(b) Trading Permit Holders may change the following fields through the Clearing Editor: (1) Executing Firm and Contra Firm; (2) Executing Broker and Contra Broker; (3) CMTA; (4) Account and Sub Account; (5) Customer ID; (6) Position Effect (open/close); or (7) Capacity (provided the change is not from a customer capacity code of (C) to any other capacity code).

(c) Changes related to the Designated Give Up through the use of Clearing Editor are governed by Rule 5.10.

... Interpretations and Policies:

.01 Any actions the Exchange takes pursuant to this Rule 6.6 do not constitute a determination by the Exchange that a transaction was effected in conformity with the requirements of the Rules. Any improper change a Trading Permit Holder makes through Clearing Editor will be processed and given effect, but would be subject to appropriate disciplinary action in accordance with the Rules. In addition, nothing in this Rule is intended to define or limit the Exchange's ability to sanction or take other remedial action against a Trading Permit Holder pursuant to other Rules for rule violations or other activity for which the Exchange may impose remedial measures.

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