

EXHIBIT 5A

(additions are underlined; deletions are [bracketed])

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Rules of Cboe Exchange, Inc.

(currently effective)

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[Rule 10.2. Contracts of Suspended Trading Permit Holders

When a Trading Permit Holder, other than a Clearing Trading Permit Holder, is suspended pursuant to Chapter XVI of these Rules, all open short positions of the suspended Trading Permit Holder in option contracts and all open positions resulting from exercise of option contracts, other than positions that are secured in full by a specific deposit or escrow deposit in accordance with the Rules of the Clearing Corporation, shall be closed without unnecessary delay by all TPH organizations carrying such positions for the account of the suspended Trading Permit Holder; provided that the Chief Executive Officer or President may cause the foregoing requirement to be temporarily waived for such period as he may determine if he shall deem such temporary waiver to be in the interest of the public or the other Trading Permit Holder. No temporary waiver hereunder by the Chief Executive Officer or President shall relieve the suspended Trading Permit Holder of its obligations or of damages, nor shall it waive the close out requirements of any other Rule. When a Clearing Trading Permit Holder is suspended pursuant to Chapter XVI of these Rules, the positions of such Clearing Trading Permit Holder shall be closed out in accordance with the Rules of the Clearing Corporation.]

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[CHAPTER XVI. SUMMARY SUSPENSION

Rule 16.1. Imposition of Suspension

A Trading Permit Holder or person associated with a Trading Permit Holder who has been and is expelled or suspended from any self-regulatory organization or barred or suspended from being associated with a Trading Permit Holder of any self-regulatory organization, or a Trading Permit Holder which is in such financial or operating difficulty that the Chief Executive Officer or the President determines that the Trading Permit Holder cannot be permitted to continue to do business as a Trading Permit Holder with safety to investors, creditors, other Trading Permit Holders, or the Exchange, may be summarily suspended by the Chief Executive Officer or the President. In addition, the Chief Executive Officer or the President may limit or prohibit any person with respect to access to services offered by the Exchange if any of the criteria or the foregoing sentence is applicable to such person or, in the case of a person who is not a Trading Permit Holder, if the Chief Executive Officer or the President determines that such person does not meet the qualification requirements or other prerequisites for such access with safety to investors, creditors, Trading Permit Holders, or the Exchange. In the event a determination is

made to take summary action, as described above, notice thereof will be sent to the Securities and Exchange Commission. Any person aggrieved by any summary action taken under this Rule shall be promptly afforded an opportunity for a hearing by the Exchange in accordance with the provisions of Chapter XIX. In addition, the Securities and Exchange Commission may on its own motion order or such a person may apply to the Securities and Exchange Commission for a stay of such summary action pending the results of a hearing pursuant to Chapter XIX.

Rule 16.2. Investigation Following Suspension

Every Trading Permit Holder or person associated with a Trading Permit Holder against which action has been taken in accordance with the provisions of this Chapter shall immediately afford every facility required by the Exchange for the investigation of his affairs and shall forthwith file with the Secretary a written statement covering all information requested, including a complete list of creditors and the amount owing to each and a complete list of each open long and short position in Exchange option contracts maintained by the Trading Permit Holder and each of his customers. The foregoing includes, without limitation, the furnishing of such of the books and records of the Trading Permit Holder or person associated with a Trading Permit Holder and the giving of such sworn testimony as may be requested by the Exchange.

Rule 16.3. Reinstatement

(a) General. A Trading Permit Holder, person associated with a Trading Permit Holder or other person suspended or limited or prohibited with respect to access to services offered by the Exchange under the provisions of this Chapter may apply for reinstatement within the time period set forth below. The Exchange may approve an application for reinstatement if it finds that the applicant is operationally and financially able to conduct his business with safety to investors, creditors, Trading Permit Holders, and the Exchange.

(b) Suspension Due to Operating Difficulty. An applicant who, by reason of operating difficulty, has been suspended or limited or prohibited with respect to Exchange services, must file any application for reinstatement within six months from the date of such action. Such application must include a statement of all actions taken by the applicant to remedy the operational difficulty in question. If the applicant fails to receive the Exchange approval required for reinstatement, or if the application is not approved by the Exchange within ninety days of its submission, the applicant shall be afforded an opportunity for a hearing in accordance with the provisions of Chapter XIX.

(c) Suspension Due to Financial Difficulty. An applicant who, by reason of financial difficulty, has been suspended or limited or prohibited with respect to Exchange services, must file any application for reinstatement within thirty days of such action. Such application must include a list of all creditors of the applicant, a statement of the amount originally owing and the nature of the settlement in each case, and such other information as may be requested by the Exchange. The Trading Permit of a Trading Permit Holder summarily suspended by reason of financial difficulty may not be revoked by the Exchange until that Trading Permit Holder has been afforded an opportunity for a hearing respecting such summary suspension pursuant to the provisions of Chapter XIX.

Rule 16.4. Failure to Obtain Reinstatement

If a Trading Permit Holder suspended under the provisions of this Chapter fails or is unable to apply for reinstatement in accordance with Rule 16.3, or fails to obtain reinstatement as therein provided, his Trading Permit shall be revoked by the Exchange.

Rule 16.5. Termination of Rights by Suspension

A Trading Permit Holder suspended under the provisions of this Chapter shall be deprived during the term of his suspension of all rights and privileges of being a Trading Permit Holder.]

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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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CHAPTER 12. SUMMARY SUSPENSION**Rule 12.1. Imposition of Suspension**

A Trading Permit Holder or person associated with a Trading Permit Holder who has been and is expelled or suspended from any self-regulatory organization or barred or suspended from being associated with a Trading Permit Holder of any self-regulatory organization, or a Trading Permit Holder which is in such financial or operating difficulty that the Chief Executive Officer or the President determines that the Trading Permit Holder cannot be permitted to continue to do business as a Trading Permit Holder with safety to investors, creditors, other Trading Permit Holders, or the Exchange, may be summarily suspended by the Chief Executive Officer or the President. In addition, the Chief Executive Officer or the President may limit or prohibit any person with respect to access to services offered by the Exchange if any of the criteria or the foregoing sentence is applicable to such person or, in the case of a person who is not a Trading Permit Holder, if the Chief Executive Officer or the President determines that such person does not meet the qualification requirements or other prerequisites for such access with safety to investors, creditors, Trading Permit Holders, or the Exchange. In the event a determination is made to take summary action, as described above, notice thereof will be sent to the Securities and Exchange Commission. Any person aggrieved by any summary action taken under this Rule shall be promptly afforded an opportunity for a hearing by the Exchange in accordance with the provisions of Chapter 15. In addition, the Securities and Exchange Commission may on its own motion order or such a person may apply to the Securities and Exchange Commission for a stay of such summary action pending the results of a hearing pursuant to Chapter 15.

Rule 12.2. Investigation Following Suspension

Every Trading Permit Holder or person associated with a Trading Permit Holder against which action has been taken in accordance with the provisions of this Chapter shall immediately afford every facility required by the Exchange for the investigation of his affairs and shall forthwith file with the Secretary a written statement covering all information requested, including a complete list of creditors and the amount owing to each and a complete list of each open long and short position in Exchange option contracts maintained by the Trading Permit Holder and each of his customers. The foregoing includes, without limitation, the furnishing of such of the books and records of the Trading Permit Holder or person associated with a Trading Permit Holder and the giving of such sworn testimony as may be requested by the Exchange.

Rule 12.3. Reinstatement

(a) General. A Trading Permit Holder, person associated with a Trading Permit Holder or other person suspended or limited or prohibited with respect to access to services offered by the Exchange under the provisions of this Chapter may apply for reinstatement within the time period set forth below. The Exchange may approve an application for reinstatement if it finds that the applicant is operationally and financially able to conduct his business with safety to investors, creditors, Trading Permit Holders, and the Exchange.

(b) Suspension Due to Operating Difficulty. An applicant who, by reason of operating difficulty, has been suspended or limited or prohibited with respect to Exchange services, must file any application for reinstatement within six months from the date of such action. Such application must include a statement of all actions taken by the applicant to remedy the operational difficulty in question. If the applicant fails to receive the Exchange approval required for reinstatement, or if the application is not approved by the Exchange within ninety days of its submission, the applicant shall be afforded an opportunity for a hearing in accordance with the provisions of Chapter 15.

(c) Suspension Due to Financial Difficulty. An applicant who, by reason of financial difficulty, has been suspended or limited or prohibited with respect to Exchange services, must file any application for reinstatement within thirty days of such action. Such application must include a list of all creditors of the applicant, a statement of the amount originally owing and the nature of the settlement in each case, and such other information as may be requested by the Exchange. The Trading Permit of a Trading Permit Holder summarily suspended by reason of financial difficulty may not be revoked by the Exchange until that Trading Permit Holder has been afforded an opportunity for a hearing respecting such summary suspension pursuant to the provisions of Chapter 15.

Rule 12.4. Failure to Obtain Reinstatement

If a Trading Permit Holder suspended under the provisions of this Chapter fails or is unable to apply for reinstatement in accordance with Rule 12.3, or fails to obtain reinstatement as therein provided, his Trading Permit shall be revoked by the Exchange.

Rule 12.5. Termination of Rights by Suspension

A Trading Permit Holder suspended under the provisions of this Chapter shall be deprived during the term of his suspension of all rights and privileges of being a Trading Permit Holder.

Rule 12.6. Contracts of Suspended Trading Permit Holders

When a Trading Permit Holder, other than a Clearing Trading Permit Holder, is suspended pursuant to this Chapter 12, all open short positions of the suspended Trading Permit Holder in option contracts and all open positions resulting from exercise of option contracts, other than positions that are secured in full by a specific deposit or escrow deposit in accordance with the Rules of the Clearing Corporation, shall be closed without unnecessary delay by all TPH organizations carrying such positions for the account of the suspended Trading Permit Holder;

provided that the Chief Executive Officer or President may cause the foregoing requirement to be temporarily waived for such period as he may determine if he shall deem such temporary waiver to be in the interest of the public or the other Trading Permit Holder. No temporary waiver hereunder by the Chief Executive Officer or President shall relieve the suspended Trading Permit Holder of its obligations or of damages, nor shall it waive the close out requirements of any other Rule. When a Clearing Trading Permit Holder is suspended pursuant to this Chapter 12, the positions of such Clearing Trading Permit Holder shall be closed out in accordance with the Rules of the Clearing Corporation.

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