



Via Portal Submission

November 17, 2015

Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: OneChicago, LLC Rule Submission
New OCX Rules 618 (Wash Trades), 619 (Money Passes), 620 (Accommodation
Trading) & NTM 2015-35
(OCX Submission Number 15-014)

Dear Mr. Kirkpatrick:

Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”), and § 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or the “Commission”) under the Act, OneChicago, LLC (“OneChicago,” “OCX,” or the “Exchange”) hereby submits the following rule change and corresponding Notice to Members (“NTM”), which will become effective on December 3, 2015.

OneChicago is proposing to insert new OCX Rules 618 (Wash Trades), 619 (Money Passes), and 620 (Accommodation Trading) into the OCX Rulebook. New OCX Rule 618 will codify the prohibition on wash trades. New OCX Rule 619 will codify the prohibition on money passes. New OCX Rule 620 will codify the prohibition on accommodation trading. Wash trades and money passes are already prohibited by the Rules of the Exchange, and may fall under OCX Rule 601 (Fraudulent Acts), 602 (Fictitious Transactions), or other rules contained in Chapter 6 of the OCX Rulebook. However, OneChicago is adding new OCX Rules 618 and 619 to explicitly prohibit such practices in its Rulebook. Similarly, the Exchange would find that accommodation trading is already prohibited by Chapter 6 of the OCX Rulebook, but is inserting new OCX Rule 620 to codify the prohibition on accommodation trading and clarify this prohibition to OneChicago’s market participants. These rule changes are in line with other designated contract market (“DCM”) rulebooks.

OneChicago is concurrently issuing NTM 2015-35. The purpose of NTM 2015-35 is to make market participants aware of new OCX Rules 618, 619, and 620. The text of new OCX Rules 618, 619, and 620 is attached as Attachment A, and NTM 2015-35 is attached as Attachment B.

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The purpose and effect of the rule is to codify the prohibition on certain trading practices in the OCX Rulebook. Comments on these new rules have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to this rule. OneChicago certifies that the rule complies with the Act, including the core principles, and the Commission's regulations promulgated thereunder. OneChicago further certifies that a copy of this submission has been posted on the [OneChicago website](#). OneChicago staff has reviewed the core principles applicable to DCMs, and has concluded that the proposed rule may have some bearing upon the following core principles:

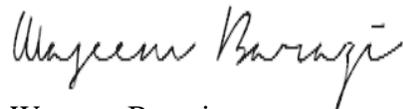
Core Principle 2: Core Principle 2 requires that a DCM establish, monitor, and enforce compliance with the rules of the contract market, including abusive trade practices.

Core Principle 12: Core Principle 12 requires that a DCM establish and enforce rules that protect markets and market participants from abusive practices, and promote fair and equitable trading.

This new rule and associated NTM support Core Principles 2 and 12 in that they further OneChicago's ability to meet its self-regulatory obligations and prohibit certain trading practices.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3441 or through e-mail at wbarazi@onechicago.com.

Respectfully Submitted,



Waseem Barazi
Chief Regulatory Officer and Associate General Counsel

Encl: Attachment A
Attachment B

Attachment A

618. Wash Trades

No Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall place or accept buy and sell orders in the same Contract and expiration, where the Clearing Member, Exchange Member (including their respective Related Parties) or Access Person knows or should know that the purpose of the orders is to avoid taking a bona fide market position exposed to market risk (transactions commonly known or referred to as wash trades). Buy and sell orders for different accounts with common beneficial ownership that are entered with the intent to negate market risk or price competition shall also be deemed to violate the prohibition on wash trades. Additionally, no Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall knowingly execute or accommodate the execution of such orders by direct or indirect means.

619. Money Passes

No Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall prearrange the execution of transactions on the Exchange for the purpose of passing money between accounts. All transactions executed on the Exchange must be made in good faith for the purpose of executing bona fide transactions, and prearranged trades intended to effectuate a transfer of funds from one account to another are prohibited.

620. Accommodation Trading

No Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall enter into transactions on the Exchange for the purpose of assisting another Person to engage in transactions that are in violation of the Rules of the Exchange or Applicable Law.

Attachment B

(See Following Page)

Date: November 17, 2015

Re: New OCX Rules 618 (Wash Trades), 619 (Money Passes), and 620 (Accommodation Trading)

Effective Date: December 3, 2015

OneChicago, LLC (“OneChicago” or “OCX”) is issuing this Notice to Members (“NTM”) 2015-35 to inform market participants that, pending regulatory review, OneChicago has adopted new OCX Rules 618 (Wash Trades), 619 (Money Passes), and 620 (Accommodation Trading).

New OCX Rule 618 will codify the prohibition on wash trades. New OCX Rule 619 will codify the prohibition on money passes. New OCX Rule 620 will codify the prohibition on accommodation trading. For the avoidance of doubt, wash trades and money passes are already prohibited by the Rules of the Exchange, and may fall under OCX Rule 601 (Fraudulent Acts), 602 (Fictitious Transactions), or other rules contained in Chapter 6 of the OCX Rulebook. However, OneChicago is adding new OCX Rules 618 and 619 to explicitly prohibit such practices in its Rulebook. Similarly, accommodation trading is also already prohibited by Chapter 6 of the OCX Rulebook, but the Exchange is inserting new OCX Rule 620 to codify the prohibition on accommodation trading and clarify this prohibition to OneChicago’s market participants.

The text of new OCX Rules 618, 619, and 620 is displayed below:

* * *

618. Wash Trades

No Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall place or accept buy and sell orders in the same Contract and expiration, where the Clearing Member, Exchange Member (including their respective Related Parties) or Access Person knows or should know that the purpose of the orders is to avoid taking a bona fide market position exposed to market risk (transactions commonly known or referred to as wash trades). Buy and sell orders for different accounts with common beneficial ownership that are entered with the intent to negate market risk or price competition shall also be deemed to violate the prohibition on wash trades. Additionally, no Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall knowingly execute or accommodate the execution of such orders by direct or indirect means.

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No Clearing Member, Exchange Member (including their respective Related Parties) or Access Person shall enter into transactions on the Exchange for the purpose of assisting another Person to engage in transactions that are in violation of the Rules of the Exchange or Applicable Law.

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Any questions regarding this NTM should be directed to Waseem Barazi, Chief Regulatory Officer and Associate General Counsel at (312) 883-3441 or wbarazi@onechicago.com.