March 7, 2023

Submitted via Portal

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

> **Re:**
> **CFTC Regulation 40.6(a) Required Certification AEGIS SEF, LLC**
> **Amendment to Rulebook, Participant Agreement**

Dear Sir:

Pursuant to Section 40.6(a) of the regulations of the U.S. Commodity Futures Trading Commission (the "CFTC", or the "Commission"), AEGIS SEF, LLC ("AEGIS") hereby notifies the Commission that it has amended its Rulebook and Participant Agreement. The Rule Amendments shall become effective 10 days after this submission has been filed or immediately upon approval by the CFTC, whichever occurs first.

A concise explanation and analysis of the rules and their compliance with applicable provisions of the Act, including core principles and the Commission's regulations, is attached hereto as Exhibit A. A copy of the Rulebook is attached under separate cover as Exhibit B. A redlined version of the Rulebook is attached under separate cover as Exhibit C. A copy of the Participant Agreement is attached under separate cover as Exhibit D. A redlined version of the Participant Agreement is attached under separate cover as Exhibit E. Exhibits D and E bear the designation "Confidential Treatment Requested by AEGIS SEF, LLC."

This request for confidential treatment is made pursuant to Commission Regulations 40.8, as Exhibits D and E contain information that would reveal the trade secrets or confidential commercial or financial information of AEGIS SEF and its affiliates.

AEGIS hereby certifies that: (i) the amended agreement complies with the Act and the Commission's regulations thereunder, and (ii) copy of this submission is being concurrently posted on AEGIS's website. There were no substantive opposing views to the amendments to the Rulebook and Exhibit N-1.

Please contact the undersigned at 832-413-5973 or afurman@aegis-hedging.com with any questions regarding this matter.

Andrew Furman
Chief Compliance Officer
AEGIS SEF, LLC
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The Woodlands, TX 77381

Exhibit A – Explanation

Amendment and Explanation	Supporting Rule / Core Principle
Rulebook 4.8A.2: Execution Methods for SEF Contracts • Enables two Participants to transact via the Offline Execution Functionality (OEF)	• Core Principle 1(B)- Reasonable Discretion of swap execution facility • Core Principle 2(A)- Terms, Conditions and Access to the Swap Execution Facility
Rulebook 4.18.4: Third-Party Reporting Under Parts 43 and 45 • Clarified Reporting Requirements • Conformed SDR data references to December 5, 2022 updated formatting	• Core Principle 1(B)- Reasonable Discretion of swap execution facility • Core Principle 2 – Compliance with rules • Core Principle 4(A)- Establish rules or terms and conditions • Core Principle 5 – Ability to Obtain Information • Core Principle 10 – Recordkeeping • Core Principle 15(B)(vi) – Establish Procedures for Remediation • Part 43 • Part 45

Rulebook 9.2.3: Market Data • Clarifying market data rights	• Core Principle 1(B)- Reasonable Discretion of swap execution facility
Participant Agreement: Clarifying reporting requirements for Participants who are Financial Counterparties • Clarifying reporting requirements by which SDR is being reported to	• Core Principle 1(B)- Reasonable Discretion of swap execution facility • Core Principle 2 – Compliance with rules • Core Principle 4(A)- Establish rules or terms and conditions • Core Principle 5 – Ability to Obtain Information • Core Principle 10 – Recordkeeping • Part 43 • Part 45
Participant Agreement: Market Data • Clarifying market data rights	• Core Principle 1(B)- Reasonable Discretion of swap execution facility

Exhibit B – AEGIS SEF Rulebook

(attached under separate cover)

Exhibit C – AEGIS SEF Rulebook (redlined)

(attached under separate cover)

Exhibit D – AEGIS SEF Participant Agreement

(attached under separate cover)

Exhibit E – AEGIS SEF Participant Agreement (redlined)

(attached under separate cover)