



Via Portal Submission

March 20, 2018

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
Amending OneChicago Rule 610 (Priority of Customers' Orders) and
Adding OneChicago Rule 621 (Front-Running)
(OneChicago Submission Number 18-007)

Dear Mr. Kirkpatrick:

Pursuant to §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" or the "Exchange") hereby submits the following rule amendments that will become effective on April 3, 2018. The proposed changes will clarify and strengthen the exchange's prohibition on trading ahead of customer orders and front-running, thus more closely aligning OneChicago rules with CFTC Regulation §38.152.

The proposed amendments modify OneChicago Rule 610 (Priority of Customers' Orders) to remove the 'knowingly' intent standard in order to align the rule with CFTC Regulation §38.152. Further, as Commission Regulation §38.152 specifically lists front-running as a prohibited trading practice, OneChicago Rule 621 (Front-Running) will be added to the Rulebook to clearly and specifically prohibit front-running.

Comments on the rule amendments have not been solicited and none have been received. OneChicago is not aware of any substantive opposing views to these rule amendments. OneChicago certifies that the rule amendments comply 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 rule changes may have some bearing upon the following core principle(s):

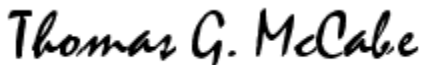
Core Principle 2: Core Principle 2 requires establishing, monitoring and enforcing compliance with rules including rules that prohibit abusive trading practices such as front-running and trading ahead. These changes support Core Principle 2 in that they clarify existing OneChicago rules against these practices and provide clear and enforceable rules that prohibit these practices.

Core Principle 7: Core Principle 7 requires DCMs to make available to market authorities, market participants, and the public accurate information concerning the rules and regulations for executing transactions on the contract market. The proposed rule changes support Core Principle 7 in that they inform market participants of specific prohibited activity.

Core Principle 12: Core Principle 12 requires establishing and enforcing rules to protect market and market participants. The changes to Rule 610 and the addition of Rule 621 provide further clarification and notification to the market participants of prohibited behavior.

If you have any questions or comments related to this filing, please feel free to contact me by telephone at (312) 883-3430 or through e-mail at tmccabe@onechicago.com.

Respectfully Submitted,

Handwritten signature of Thomas G. McCabe in black ink.

Thomas G. McCabe
Chief Regulatory Officer

Encl: Attachment A

Attachment A

(See Following Page)

Additions underlined, deletions are struck through

610. Priority of Customers' Orders

(a) No Clearing Member or, if applicable, Exchange Member or Access Person (including in each case its Related Parties) shall ~~knowingly~~ buy a Contract for a personal or proprietary account of such Clearing Member, Exchange Member or Access Person or for an account in which such Clearing Member, Exchange Member or Access Person has a proprietary interest, when such Clearing Member, Exchange Member or Access Person has in hand Orders to buy the same Contract for any other Person at the same price or at the market price. No Clearing Member or, if applicable, Exchange Member or Access Person (including in each case its Related Parties) shall ~~knowingly~~ sell a Contract for a personal or proprietary account of such Clearing Member, Exchange Member or Access Person or for an account in which such Clearing Member, Exchange Member or Access Person has a proprietary interest, when such Clearing Member, Exchange Member or Access Person has in hand Orders to sell the same Contract for any other Person at the same price or at the market price.

(b) No Clearing Member or, if applicable, Exchange Member or Access Person (including in each case its Related Parties) shall ~~knowingly~~ execute a discretionary Order for any Contract, including, without limitation, an Order allowing such Clearing Member, Exchange Member or Access Person (including in each case its Related Parties) discretion as to time and price, for an immediate family member or for a personal or proprietary account of any other Clearing Member, Exchange Member or Access Person, when such Clearing Member, Exchange Member or Access Person has in hand any Customer Market Order for the same Contract open as to time and price. A Clearing Member or, if applicable, Exchange Member or Access Person (including in each case its Related Parties) may trade for a personal or proprietary account of such Clearing Member, Exchange Member or Access Person, without violating this Rule 610, while holding any Customer Order for the same Contract open as to time and price, provided such Customer has previously consented thereto.

(c) – No changes

(d) For purposes of this Rule 610, no Clearing Member or, if applicable, Exchange Member or Access Person, in each case that consists of more than one individual, shall be deemed to ~~knowingly~~ buy or sell a Contract or execute a discretionary Order if (i) such Clearing Member, Exchange Member or Access Person has in place appropriate “firewall” or separation of function procedures and (ii) the individual buying or selling the Contract or executing the discretionary Order in question has no direct knowledge of the Order to buy or sell the same Contract for any other Person at the same price or at the market price or of the Customer Order for the same Contract, as the case may be.

621. Front-Running

No Clearing Member or, if applicable, Exchange Member or Access Person (including in each case its Related Parties) shall take a position in a Contract based upon non-public information regarding an impending transaction by another Person in the same or a related Contract, except as expressly permitted by Rules 416, 417 and 611 or in accordance with any policies or procedures for pre-execution discussions from time to time adopted by the Exchange.