

December 10, 2024

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) Rule Certification - AEGIS Markets
Amendments to Rulebook and Exhibit N-1 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 Markets ("AEGIS") hereby notifies the Commission that it has amended its Rulebook and N-1 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 Exhibit N-1 Participant Agreement is attached under separate cover as Exhibit D. A redlined version of Exhibit N-1 Participant Agreement is attached under separate cover as Exhibit E.

AEGIS hereby certifies that: (i) the amended rules comply with the Act and the Commission's regulations thereunder, and (ii) a notice and copy of this submission is being concurrently posted on AEGIS's website. There were no substantive opposing views to the amendments.

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

Andrew Furman

Andrew Furman
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AEGIS Markets
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Exhibit A – Explanation

Amendment and Explanation	Supporting Rule / Core Principle
<p>Rule 1.16 - Block Trades</p> <ul style="list-style-type: none"> Definition amended to allow for Block Trades 	<ul style="list-style-type: none"> Core Principle 1 – Compliance with Core Principles Core Principle 2 – Compliance with Rules Core Principle 4 – Monitoring of Trading and Trade Processing Core Principle 15 – Designation of Chief Compliance Officer CFTC Regulation 43.6(h)(1)
<p>Rule 4.11 – Block Trades</p> <ul style="list-style-type: none"> Amended to allow for Block Trades pursuant to CFTC Regulation 43.6(h)(1) and state process for determining minimum block sizes. 	<ul style="list-style-type: none"> Core Principle 1 – Compliance with Core Principles Core Principle 2 – Compliance with Rules Core Principle 4 – Monitoring of Trading and Trade Processing Core Principle 15 – Designation of Chief Compliance Officer CFTC Regulation 43.6(h)(1)
<p>Rule 4.18 – Parts 43 and 45 Reporting</p> <ul style="list-style-type: none"> Amended to clarify block trade process for Reporting Counterparties which have AEGIS SEF submit Part 43 and Part 45 on their behalf 	<ul style="list-style-type: none"> Core Principle 1 – Compliance with Core Principles Core Principle 2 – Compliance with Rules Core Principle 4 – Monitoring of Trading and Trade Processing Core Principle 15 – Designation of Chief Compliance Officer CFTC Regulation 43.6(h)(1)

<p>Rule 4.18.4 – Third Party Reporting Under Parts 43 and 45</p> <ul style="list-style-type: none"> Amended to clarify requirements for Third-Party Reporters electing to submit block trades 	<ul style="list-style-type: none"> Core Principle 1 – Compliance with Core Principles Core Principle 2 – Compliance with Rules Core Principle 4 – Monitoring of Trading and Trade Processing Core Principle 15 – Designation of Chief Compliance Officer CFTC Regulation 43.6(h)(1)
<p>Rule 4.18.5 – Public Dissemination under Part 43</p> <ul style="list-style-type: none"> Amending to allow for Block Trades 	<ul style="list-style-type: none"> Core Principle 1 – Compliance with Core Principles Core Principle 2 – Compliance with Rules Core Principle 4 – Monitoring of Trading and Trade Processing Core Principle 15 – Designation of Chief Compliance Officer CFTC Regulation 43.6(h)(1)

Exhibit B – AEGIS Markets Rulebook - clean

(attached under separate cover)

Exhibit C – AEGIS Markets Rulebook - redline

(attached under separate cover)

Exhibit D – AEGIS Markets Exhibit N-1 Participant Agreement - clean

(attached under separate cover)

Exhibit E – AEGIS Markets Exhibit N-1 Participant Agreement - redline

(attached under separate cover)