



### SEF Rules

<b>Submitter Information</b>	
Organization Name trueEX LLC	
Organization Type SEF	Organization Acronym TRUSEF
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<b>Cover Sheet</b>	
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Submission Type 40.6(a) Rule Certification	
Submission Description Amendment to Designated Market Maker Program	
<input checked="" type="checkbox"/>	Request Confidential Treatment
Registered Entity Identifier Code 2019-06S	
Rule Numbers 309	
Date of Intended Implementation 9/17/2019	
<b>Documents</b>	
CFTC 2019-06S Designated Market Marker Program_cftc.pdf (Confidential Treatment Requested)	
<b>Request For Confidential Treatment - Detailed Written Justification</b>	
FOIA notice_SEF DMM Program 9.4.19.pdf	



September 4, 2019

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

**RE: trueEX LLC Exchange Fees and Designated Market Maker Program (trueEX LLC submission #2019-06S)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, (the "Act") and Commission Regulation 40.6(a), trueEX, LLC ("trueEX" or the "Exchange") hereby submits to the Commodity Futures Trading Commission (the "Commission") an amendment to the terms of trueEX's Designated Market Maker Program (the "DMM Program") for Tassat Products (formerly known as trueDigital Products). See Exhibit A-1 and A-2. Exhibit A-1 will be posted publically on trueEX's Web Site as a redacted versions of Exhibi A-2. trueEX is requesting confidential treatment of Exhibit A-2. This amendment to the DMM program will be effective no earlier than September 17, 2019.

trueEX certifies that this rule complies with the Act and the Commission's regulations thereunder. The DMM Program complies with Core Principle 2 and CFTC Regulation 37.202.

There were no substantive opposing views to the fees and DMM Program by the trueEX governing board or market participants. Furthermore, trueEX certifies that this certification has been posted concurrently on the Exchange's Web site at <http://www.trueex.com/rules-and-notice>.

If you have questions regarding this submission, please contact me at (312) 320-8934 or by email at [fran@trueex.com](mailto:fran@trueex.com).

Sincerely,

A handwritten signature in black ink that reads "Fran Kenck".

Fran Kenck  
Chief Compliance Officer

**EXHIBIT A-1**



## **trueEX Designated Market Maker Program for Tassat Products ("DMM Program")**

### **A. Program Purpose**

The purpose of the program is to provide an incentive for Participants to increase streaming on trueEX LLC's central limit order book ("CLOB") in the products listed below.

### **B. Product Scope**

Tassat Products (formerly known as trueDigital Products<sup>1</sup>) listed for trading on trueEX. Initially, this will include Bitcoin physically deliverable swaps, and will include other Tassat Products when self-certified with the CFTC and launched by trueEX.

### **C. Eligible Participants**

Any trueEX Participant is eligible to participate with a properly executed Designated Market Maker Agreement in place with the Exchange (a "DMM").

### **D. Program Term**

The DMM Program will be offered beginning upon launch of any Tassat Product available for trading on trueEX. The term of the DMM Program for a Participant will begin as of the first day of the month following the execution of an agreement with the Exchange and continue for a period of twelve (12) months thereafter (the "Initial Term"). The Exchange may extend the Initial Term for up to twelve (12) months, subject to CFTC re-certification.

### **E. Parameters**

[Redacted]

### **F. Program Incentives**

[Redacted]

### **G. Monitoring and Termination of Status**

Notwithstanding anything to the contrary in this schedule, the Exchange reserves the right to terminate the DMM Program at any time, provided the DMM Program is terminated with respect to all Participants, generally and on equal terms.

The Exchange shall monitor trading activity and each DMM's performance and shall retain the right to terminate a Participant's DMM status if the Exchange concludes from its review that a DMM is failing, or has failed, to meet the Streaming Parameters in Section E above.

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<sup>1</sup> In September 2019, trueDigital changed its name to Tassat. Concurrent with this filing, trueEX self-certified its rulebook with the name change reflected throughout.



A DMM may withdraw from the DMM Program at any time upon written notice to the Exchange, with no further obligations hereunder.

A DMM shall be entitled to all incentives and benefits earned prior to any termination and any amounts shall be paid to the DMM pursuant to Section F.