FMX Futures Exchange, L.P.
Amendment to Rule III-19
Submission #2025-31
December 19, 2025

Via Electronic Portal

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

1. FMX Futures Exchange, L.P. ("FMX" or the "Exchange") hereby certifies to the Commodity Futures Trading Commission ("CFTC" or "Commission") the attached amendment to FMX Rule III-19 in accordance with CFTC Regulation 40.6(a).

2. The proposed effective date of the rule amendment is January 8, 2026.

3. Attached please find a certification that: (1) this rule amendment complies with the Commodity Exchange Act and the Commission's regulations thereunder; and (2) concurrent with this submission, the Exchange posted on its website, https://www.fmxfutures.com/rules-notices/exchange-notices/: (i) a notice of pending certification of this rule submission with the Commission; and (ii) a copy of this submission.[1]

4. A concise explanation of the amendment to Rule III-19 appears below.

5. No opposing views to this rule amendment were expressed to FMX.

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[1] *See* https://www.fmxfutures.com/rules-notices/exchange-notices/. Capitalized terms used but not defined herein shall have the meanings given to such terms in the FMX Rules, and references to "FMX Rules" or an "FMX Rule" refer to such rules.

A CONCISE EXPLANATION OF THE RULE AMENDMENT, INCLUDING CORE PRINCIPLES.

Attached to this document is Exhibit I, which reflects an amendment to Rule III-19, Recording of Orders and Record Keeping, that will take effect on January 8, 2026. The amendment will clarify and, where necessary, replace legacy terminology utilized in Rule III-19 pertaining to the minimum recordkeeping requirements for Orders required to be recorded in writing under Rule III-19(a). The Exchange is clarifying that the Exchange defined term "User ID," is referred to as the "FMX Futures User ID" in both FIX Protocol and Binary Order Protocol audit trail specifications. Additionally, the Exchange is replacing the legacy term "Source ID," which is no longer used in the Exchange's audit trail specifications, with "Client Specified Trader ID". Finally, the Exchange is clarifying that previous requirement to retain the "order number assigned by the receiving FMX Participant" refers specifically to the "Client Order ID", an order attribute referred to as "ClOrdID" in FIX Protocol and "Order Identifier" in Binary Order Protocol. These changes are intended to clarify and enhance FMX Participant's understanding of the Exchange's recordkeeping requirements for such Orders.

FMX has reviewed the core principles for DCMs set forth in Section 5 of the Commodity Exchange Act and in the Commission's Part 38 Regulations thereunder ("Core Principles"), as well as the FMX Rules. Based on its review, FMX has identified the following Core Principles as relevant to its assessment of the amendment to Rule III-19:

- ***Core Principle 2, Compliance with Rules.*** FMX believes that the amended Rule III-19 will provide clarifications to the marketplace and enhance Compliance with its requirements for recordkeeping of Orders required to be recorded in writing.

- ***Core Principle 7, Availability of General Information.*** FMX is making information about the Rule amendment available to the Commission, its regulatory services provider, all Participants, Direct Access Customers, Customers, and the public.

- ***Core Principle 10, Trade Information.*** FMX is clarifying and replacing legacy terms to aid Exchange Participants to comply with the minimum recordkeeping requirements of Rule III-19 for any Orders required to be recorded in writing. Recording of such information identified in amended Rule II-19 will assist the Exchange in the preventions of Customer and market abuses.

Chapter XIV of the FMX Rules also provides for the Exchange's Chief Compliance Officer to conduct investigations and to bring disciplinary measures against such parties for violation of its Rules.

CERTIFICATIONS PURSUANT TO SECTION 5c OF THE COMMODITY EXCHANGE ACT, 7 U.S.C. §7A-2 AND COMMODITY FUTURES TRADING COMMISSION RULE 40.6, 17 C.F.R. §40.6

I hereby certify that:

(1) The rule as attached complies with the Commodity Exchange Act and the Commission's regulations thereunder; and

(2) Concurrent with this submission, FMX Futures Exchange, L.P. posted on its website, https://www.fmxfutures.com/rules-notices/exchange-notices/: (a) a notice of pending certification of this rule submission with the Commission; and (b) a copy of this submission.

Rhianna Ross

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By: Rhianna Ross
Title: Chief Regulatory Officer
Date: December 19, 2025

Exhibit I

CHAPTER III

FMX TRADING STANDARDS

. . . .

III-19 Recording of Orders and Record Keeping

(a) Any Order, except an Order for a proprietary account, which is not in the form of an electronic or written record, and which is not immediately entered into the Exchange Trading System upon receipt, must within one (1) minute of its receipt be recorded in writing or caused to be recorded in writing by the FMX Participant receiving such Order.

(b) The record of any Orders required to be recorded in writing under paragraph (a) of this Rule III-19 shall:

> (i) include the account identification, User ID (referred to as "FMX Futures User ID" in both FIX and Binary Order Protocols), ~~Source ID~~ Client Specified Trader ID (referred to as "Client Specified Trader ID" in FIX and Binary Order Protocols), if applicable, and ~~Order number assigned by the receiving FMX Participant~~ Client Order ID (referred to as "ClOrdID" in FIX Protocol and "Order Identifier" in Binary Order Protocol);

> (ii) include a date and time stamp to the nearest minute when the Order was received; and

> (iii) be written or in an electronic form, in each case, which is not subject to erasure and is otherwise satisfactory to the Exchange.

(c) All memoranda reflecting Orders for a Customer Account shall be retained in accordance with Rule XII-1.

(d) All Order-related information entered into the Exchange Trading System shall be retained by the Exchange for the time period set forth in Rule XII-1.

(e) All Orders executed in accordance with Rule XI-6 (EFRP Transactions) and XI-7 (Block Trading), unless otherwise exempted by Rule, are subject to the following record keeping requirements:

> (i) At the time of execution, every Order received from a Customer must be in the form of a written or electronic record and include an electronic timestamp reflecting the date and time such Order was received and must identify the specific account(s) for which the Order was placed.

> (ii) Such record shall also include an electronic timestamp reflecting the date and time stamp such Order was executed or canceled.