

Angelo Evangelou Assistant General Counsel Legal Division

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January 16, 2009

Via Federal Express

Ms. Elizabeth King Associate Director Division of Trading and Markets Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549-0001

Re: Form-1

Dear Ms. King:

Enclosed please find an original and two copies of a Form-1 seeking national securities exchange registration for a wholly owned CBOE subsidiary ("C2").

Please call me with any questions or comments. My phone number is (312) 786-7464.

Sincerely,

Angels Everydon

Angelo Evangelou

Enclosures