



August 2, 2013

VIA Electronic Submission

Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

RE: Request for Temporary Registration and Full Registration as a Swap Execution Facility

To Whom it May Concern:

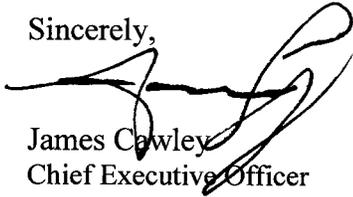
Javelin SEF, LLC (“Javelin SEF”) hereby submits this Swap Execution Facility (“SEF”) Application pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the regulations promulgated by the Commodity Futures Trading Commission (“CFTC” or “Commission”). Javelin SEF respectfully requests that the Commission grant Javelin SEF’s application for temporary registration pursuant to Commission regulation 37.3(c).

Javelin SEF further requests that the CFTC grant Javelin SEF’s application for full registration pursuant to Commission regulation 37.3(b). Pursuant to Commission regulation 37.3(b)(1)(iii), Javelin SEF requests from the Commission a unique, extensible, alphanumeric code for the purpose of identifying the SEF pursuant to part 45 of the Commission’s regulations.

Javelin SEF has submitted to the Assistant Secretary of the Commission for Freedom of Information a request for confidential treatment of the documents listed on Appendix A hereto (the “Confidential Information”). For your information we have enclosed a copy of that letter. The basis for this petition for confidential treatment is CFTC Regulation Section 145.9(d)(1)(ii), in that the Confidential Information contains trade secrets and confidential commercial and/or financial information. We request this confidential treatment for an indefinite period.

If you have any questions regarding this application, please contact Suellen Galish at (646) 307-5931.

Sincerely,



James Cawley
Chief Executive Officer

cc: Commodity Futures Trading Commission ([Email: secretary@eftc.gov](mailto:secretary@eftc.gov))

Division of Market Oversight ([Email: dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))

Nancy Markowitz, Division of Market Oversight, Commodity Futures Trading
Commission ([Email: NMarkowitz@cftc.gov](mailto:NMarkowitz@cftc.gov))

Amir Zaidi, Division of Market Oversight, Commodity Futures Trading Commission
([Email: AZaidi@cftc.gov](mailto:AZaidi@cftc.gov))

Appendix A

Confidential Information

Name of Confidential Information	Description	Identifying Number and Code
A	List of control persons of Javelin SEF	Javelin SEF Exhibit A
B	List of officers and directors of Javelin SEF	Javelin SEF Exhibit B
C	Fitness standards and composition of Board of Directors	Javelin SEF Exhibit C
D	Javelin SEF organizational chart, Addresses for legal service of process service of process	Javelin SEF Exhibit D
E	Qualifications of Javelin SEF's professional employees	Javelin SEF Exhibit E
F	Staffing requirements of Javelin SEF, Name and qualifications of each key staff person	Javelin SEF Exhibit F
G	Governance Documents & Certificate of Good Standing of Javelin SEF	Javelin SEF Exhibit G
G-1	Delaware Certificate of Formation, dated April 20, 2012	Javelin SEF Exhibit G-1
G-2	Delaware Certificate of Good Standing, dated July 26, 2013	Javelin SEF Exhibit G-2
G-3	New York State Certificate of Authority dated January 31, 2013	Javelin SEF Exhibit G-3
G-4	New York State Certificate of Good Standing, dated July 26, 2013	Javelin SEF Exhibit G-4
G-5	Limited Liability Company Agreement of Javelin SEF, LLC, dated July 31, 2013	Javelin SEF Exhibit G-5
I	Statement of Financial Condition of Javelin SEF, Operating costs, financial resources, and sources of operational resources of Javelin SEF	Javelin SEF Exhibit I
J	Financial information of certain Javelin SEF affiliates	Javelin SEF Exhibit J
K	Javelin SEF fee schedule	Javelin SEF Exhibit K
N	Service Agreements	Javelin SEF Exhibit N
N-1	Software License, Support and Maintenance Agreement, dated July 29, 2013, between Cinnober Financial Technology and Javelin SEF, LLC	Javelin SEF Exhibit N-1

N-2	CME ClearPort Developer Utility Agreement, dated July 24, 2013, between the CME and Javelin SEF, LLC	Javelin SEF Exhibit N-2
N-3	Javelin SEF On-Boarding Documentation for Customers, DSBs and DMMs	Javelin SEF Exhibit N-3
N-4	Telx Master Services Agreement, dated 8/3/2012	Javelin SEF Exhibit N-4
N-5	Contribution Agreement, dated 7/31/13	Javelin SEF Exhibit N-5
N-6	CME Repository Service Agreement for Service Providers, in draft form, between the CME and Javelin SEF, LLC	Javelin SEF Exhibit N-6
N-7	Javelin SEF On-Boarding Documentation for Clearing Members	Javelin SEF Exhibit N-7
N-8	Line of Credit Agreement between Arbor Research Holdings, LLC and Javelin SEF, LLC , dated August 2, 2013	Javelin SEF Exhibit N-8
O	Javelin SEF compliance manual	Javelin SEF Exhibit O
P	Javelin SEF disciplinary and enforcement procedures; alternative dispute resolution	Javelin SEF Exhibit P
Q-1	Functional descriptions of Javelin SEF's RFQ and Order Book systems	Javelin SEF Exhibit Q-1
Q-2	Mp4 Demonstration Video of the Javelin SEF Trading Platform	Javelin SEF Exhibit Q-2
R	Javelin SEF rules prohibiting specific trade practice violations	Javelin SEF Exhibit R
S	Discussion of how trading data will be maintained	Javelin SEF Exhibit S
T	Clearing organizations; representations that clearing members will guarantee trades	Javelin SEF Exhibit T
V-1	Organizational Structure	Javelin SEF Exhibit V-1
V-2	Risk Analysis and Oversight	Javelin SEF Exhibit V-2
V-3	System Operations	Javelin SEF Exhibit V-3
V-4	System Development Methodology	Javelin SEF Exhibit V-4
V-5	Information Security	Javelin SEF Exhibit V-5
V-6	Physical Security & Environmental Controls	Javelin SEF Exhibit V-6
V-7	Capacity Planning & Testing	Javelin SEF Exhibit V-7
V-8	Business Continuity & Disaster Recovery	Javelin SEF Exhibit V-8