



45 Lansing St,
#2205,
San Francisco, CA, 94105

FOIA CONFIDENTIAL TREATMENT REQUEST
Pursuant to 17 C.F.R. §§ 38.3(a)(3), 38.3(a)(4), 145.5 and 145.9

December 27th, 2019

VIA ELECTRONIC MAIL

Assistant Secretary for FOI, Privacy
and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, N.W.
Washington, D.C. 20581
FOIAsubmissions@cftc.gov

Re: FOIA Confidential Treatment Request

Dear Sir or Madam,

KalshiEX LLC (“Submitter”) has on this date provided the documents described in Appendix A to this letter (the “Confidential Submission”) through the Commission website and via electronic mail to the Division of Market Oversight.

In accordance with the provisions of Commission Regulations 38.3(a)(3), 38.3(a)(4), 145.5 and 145.9, Submitter hereby requests confidential treatment of the Confidential Submission. Confidential treatment is requested, *inter alia*, on the grounds that the Confidential Submission contains data and information which would separately disclose business transactions and trade secrets that may not be disclosed to third parties, as provided in Section 8(a) of the Commodity Exchange Act and Commission Regulation 145.5(c)(1). Confidential treatment additionally is requested on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act (“FOIA”) and Commission Regulations 145.5(d) and 145.9(d)(1)(ii) because it contains commercial and financial information that is confidential and would be of material assistance to competitors of Submitter.

In accordance with the provisions of paragraph (d)(5) of Regulation 145.9, Submitter requests that the Confidential Submission be afforded confidential treatment in perpetuity. Submitter understands that if the Commission receives a FOIA request for the Confidential Submission, Submitter will be notified of such request in accordance with the Commission's regulations and be asked to submit, within ten business days, a detailed written justification for confidential treatment of the Confidential Submission. In such an event, Submitter requests that Commission staff telephone or email the undersigned rather than rely upon United States mail for such notice.

If the Commission or its staff transmits any of the Confidential Submission to another federal agency, Submitter requests that you forward a copy of this letter to any such agency with the Confidential Submission and further requests that you advise any such agency that Submitter has requested that this material be accorded confidential treatment.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other federal agency) and which (1) incorporate, include or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between Submitter, its current or former employees, representatives, agents, auditors or counsel on the one hand and employees of the Commission (or any other government agency) on the other, relating to the Confidential Submission.

If you should have any questions or comments or require further information, please do not hesitate to contact the undersigned at luana@kalshi.com or 412-353-5401.

Sincerely,

Luana Lopes Lara

Luana Lopes Lara
Chief Operating Officer

Appendix A

KalshiEX LLC requests that the following information be subject to its request for confidential treatment pursuant to §145.9 of the Commission regulations:

- Exhibit A (Ownership)
- Exhibit B (Board and Governance)
- Exhibit C (Fitness Standards)
- Exhibit D (Organizational Structure)
- Exhibit E (Personnel Qualifications)
- Exhibit F (Staffing Requirements)
- Exhibit H (Legal Proceedings)
- Exhibit I (Narrative on Financial Resources and operating costs)
- Exhibit K (Analysis of Fees, Dues and other Charges)
- Exhibit L (Regulatory Chart)
- Exhibit N (Third Party Contracts)
- Exhibit O (Compliance)
- Exhibit P (Disciplinary and Enforcement)
- Exhibit Q (Trade System Description)
- Exhibit S (Trade Information Policy)
- Exhibit T (Clearing Representations)
- Exhibit V (Technology Questionnaire and Safeguards)

TITLE	Exhibit U - Confidentiality Request
FILE NAME	Exhibit U - Confi...y Request (1).pdf
DOCUMENT ID	0fefcc7500bdb99f149218d4af00ae474ecc6718
AUDIT TRAIL DATE FORMAT	MM / DD / YYYY
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Document History



SENT

12 / 27 / 2019

18:10:16 UTC

Sent for signature to Luana Lopes Lara (luana@kalshi.com)
 from tarek@kalshi.net
 IP: 89.249.216.4



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12 / 27 / 2019

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SIGNED

12 / 27 / 2019

18:36:32 UTC

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The document has been completed.