



October 15, 2020

VIA ELECTRONIC MAIL (FOIAsubmissions@cftc.gov)

Assistant Secretary of the Commission for FOIA Matters
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request: Petition Pursuant to Regulation 145.9(d)

To Whom It May Concern:

On October 15, 2020, Tassat Derivatives LLC (“Tassat”) submitted an Application for Reinstatement as a Swaps Execution Facility via electronic mail to Mr. Christopher J. Kirkpatrick, Secretary of the Commodity Futures Trading Commission. By this Petition and pursuant to Section 145.9(d) of the Commission’s regulations, Tassat hereby requests confidential treatment of certain information and documents described in the attached Appendix A (“Confidential Material”).

Pursuant to Sections 8(a) of the Commodity Exchange Act (“CEA”) and Commission Regulation 145.9(d), Tassat requests confidential treatment of the Confidential Material on the grounds that disclosure of such material would reveal trade secrets of Tassat and/or reveal Tassat’s confidential commercial information. The Confidential Material is proprietary to Tassat and contains highly sensitive and confidential business and technology information. In addition to violating Tassat’s proprietary rights, the disclosure of the Confidential Material would grant competitors an unfair competitive advantage and/or compromise the competitive advantages possessed by Tassat. Accordingly, Tassat is requesting that Mr. Kirkpatrick, staff members of the Division of Market Oversight and staff of any other division that may have reason to review any of the Confidential Material take appropriate steps to keep the Confidential Material submitted and provided to them confidential and to restrict the redistribution of the Confidential Material.

Pursuant to Commission Regulation 145.9(d)(5), Tassat hereby requests that the Confidential Material be afforded confidential treatment in perpetuity.

Tassat also requests that the Commission notify the undersigned immediately after receiving any FOIA request, any court order, subpoena, or summons seeking to access the Confidential Material in whole or in part. Tassat further requests notification through the undersigned in the event that the Commission intends to disclose the Confidential Material in whole or in part to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. Tassat does not waive its notification under Section 8(f) of the CEA with respect to any subpoena or summons with respect to the Confidential Material in whole or in part.

Should you have any questions regarding the above, please contact the undersigned via phone at 312-371-3229 or via email to ann.cresce@tassat.com.

Respectfully submitted,

A handwritten signature in cursive script that reads "Ann Cresce".

Ann M. Cresce
Chief Compliance Officer

cc: Mr. Christopher J. Kirkpatrick

Attachment: Appendix 1

APPENDIX A
TASSAT DERIVATIVES LLC

Tassat Table of Contents
Tassat Derivatives LLC FOIA Treatment Request Letter with Appendix
Tassat Derivatives LLC SEF Cover Sheet
Tassat Exhibit A – Ownership
Tassat Exhibit B – Officer and Director Information
Tassat Exhibit C – Public Director Questionnaire
Tassat Exhibit D – Corporate Structure
Tassat Exhibit E – Personnel Qualifications
Tassat Exhibit F – Staff Requirements and Qualifications
Tassat Exhibit H – Material Legal Proceedings
Tassat Exhibit I – Financial Information
Tassat Exhibit K1 – Tassat Market Maker Agreement
Tassat Exhibit K2 – Tassat Schedules to Market Maker Agreement
Tassat Exhibit L1 – SEF Core Principles Chart (marked version)
Tassat Exhibit N – Material Agreement Addendum
Tassat Exhibit O1 – Market Supervision Manual (clean version)
Tassat Exhibit O2 – Market Supervision Manual (marked version)
Tassat Exhibit Q – Trading Platform
Tassat Exhibit S – Maintenance of Trading Data
Tassat Exhibit U - Documents Subject to Request for Confidential Treatment
Tassat Exhibit V1 – Technology Questionnaire Section 1
Tassat Exhibit V2 – Security Presentation
Tassat Exhibit V3 – Tassat Disaster Recovery Policy
Tassat Exhibit V4 – Tassat Third Party Vendor Procedures
Tassat Exhibit V5 – Tassat Vulnerability Management Procedures