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July 29, 2021

*Sent via email and electronically via FTP*

Assistant Secretary of the CFTC  
for FOIA Matters  
Three Lafayette Center  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: FOIA Confidential Treatment Request

This Petition for Confidential Treatment requests confidential treatment for the entirety of the Application for Contract Market Designation by Aristotle Exchange DCM, Inc., and the entirety of the Application for Registration as a DCO by Aristotle Exchange DCO, Inc., (separately or together, the “Applicant”) **except** for the following documents:

DCM Application:

- DCM Application transmittal letter,
- this Petition for Confidential Treatment,
- first page of the Form DCM cover sheet,
- Exhibit A-1 (setting forth the Applicant’s corporate ownership),
- Exhibit A-2 (setting forth the Applicant’s governance structure),
- Exhibit A-3 (setting forth the Applicant’s governance structure),
- Exhibit G-1 (establishing the Applicant’s legal status),
- Exhibit L-1 (regulatory compliance chart), and
- Exhibit M-1 (proposed rulebook).

DCO Application:

- DCO Application transmittal letter,
- this Petition for Confidential Treatment,
- first page of the Form DCO cover sheet,
- Exhibit A-1 (regulatory compliance chart),
- Exhibit A-2 (proposed rulebook),
- Exhibit A-5a (setting forth the Applicant’s governance structure),
- Exhibit A-5b (setting forth the Applicant’s governance structure),
- Exhibit A-7 (setting forth the Applicant's corporate ownership), and
- Exhibit A-8 (establishing the Applicant’s legal status).

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Dear Sir or Madam:

Aristotle Exchange DCM, Inc and Aristotle Exchange DCO, Inc. (the "Requestors") hereby request that the Application for Designation as a Contract Market and the Application for Registration as a Derivatives Clearing Organization, in their entirety with the exception of the documents bulleted above, and enclosed herewith, be afforded confidential treatment in accordance with the Freedom of Information Act ("FOIA"), 5 U.S.C. 552, and CFTC Rules thereunder, 17 C.F.R. §145.9, for an indefinite period of time due to the sensitive commercial and proprietary nature of the information contained therein, public disclosure of which could be detrimental to the requestor. As prescribed by 17 C.F.R. §145.9(d)(4), each page of the document included in this request, bears the legend that Confidential Treatment is being requested by the requestor.

In accordance with the foregoing regulations, kindly notify me at the above address or at (202) 663-6240 of any request under FOIA for access to any enclosed document or portion thereof to enable the requestor to substantiate the grounds for confidential treatment, or if you have any questions regarding this petition or any of the enclosed items.

Sincerely,

  
Paul M. Architzel