



ICAP Global Derivatives Limited  
2 Broadgate  
London  
United Kingdom  
EC2M 7UR

March 24, 2020

**FOIA CONFIDENTIAL TREATMENT REQUEST**

By overnight mail and email: FOIAsubmissions@cftc.gov

Assistant Secretary of the Commission for FOI,  
Privacy and Sunshine Acts Compliance  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: Freedom of Information Act (“FOIA”) Confidential Treatment Request for Information Submitted to the CFTC by ICAP Global Derivatives Limited Pursuant to CFTC Regulation 40.6

Dear Sir or Madam:

ICAP Global Derivatives Limited (“IGDL”), a swap execution facility registered with the Commodity Futures Trading Commission (“CFTC”), today submitted to the CFTC’s Division of Market Oversight a rule certification pursuant to CFTC Regulation 40.6 (the “IGDL Submission” or “IGDL-2020-R-1”). The IGDL Submission was submitted via the CFTC Portal.

IGDL hereby requests, pursuant to CFTC Regulation 145.9, that Confidential Exhibit H, Confidential Exhibit I and Confidential Exhibit J of the IGDL Submission (the “Confidential Documents”) be accorded confidential treatment on the grounds that disclosure would reveal confidential commercial and financial information and would be of material assistance to competitors of IGDL. Our specification of these grounds for confidential treatment shall not preclude us from identifying additional grounds for confidential treatment at a later time. Each page of the Confidential Documents has been labeled “Confidential Treatment Requested by ICAP Global Derivatives Limited” and numbered as provided on Schedule A attached hereto.

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Additionally, IGDL requests FOIA confidential treatment of any notes, memoranda or other records created by or at the direction of the CFTC, its officers or staff members, that reflect, refer or relate to the Confidential Documents (the “Confidential Records”, and together with the Confidential Documents, the “Confidential Information”).

This request for FOIA confidential treatment is sought for as long as the CFTC remains in control and/or possession of any Confidential Information.

We request that if the CFTC receives a FOIA request for any Confidential Information, IGDL will be notified of such request in accordance with the CFTC’s regulations and have the opportunity to submit a written justification for confidential treatment of the Confidential Information.

In the event the CFTC or its staff provides any of the Confidential Information to another federal agency, we request that the CFTC provide a copy of this letter to such agency with the Confidential Information and further request that the CFTC or its staff inform such agency that IGDL has requested that this material be accorded confidential treatment.

In addition, please note the accompanying request that your Office acknowledge receipt of the request for confidential treatment, by date-stamping and returning one copy of the enclosed cover letter, in the enclosed self-addressed, postage-prepaid envelope.

Please promptly inform Mr. Brian Donnelly, Chief Compliance Officer, ICAP Global Derivatives Limited at 101 Hudson Street, Jersey City, New Jersey 07302, or by email at [bddonnelly@tullettprebon.com](mailto:bddonnelly@tullettprebon.com), of any request under FOIA seeking access to the Confidential Information to enable IGDL to further substantiate the grounds for confidential treatment.

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Thank you for your attention to this matter. Please contact the undersigned at (201) 984-6956 or by email at [bddonnelly@tullettprebon.com](mailto:bddonnelly@tullettprebon.com) with any questions.

Very truly yours,

ICAP Global Derivatives Limited



By: \_\_\_\_\_

Name: Brian D. Donnelly

Title: Chief Compliance Officer

Date: March 24, 2020

Enclosures

cc: CFTC Division of Market Oversight (Email: [dmosubmissions@cftc.gov](mailto:dmosubmissions@cftc.gov))  
Nancy Markowitz, CFTC (Email: [nmarkowitz@cftc.gov](mailto:nmarkowitz@cftc.gov))

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**SCHEDULE A  
CONFIDENTIAL INFORMATION**

<b>Document Subject to Request for Confidential Treatment Pursuant to §145.9</b>	<b>Identifying Number and Code</b>
IGDL-2020-R-1 - Confidential Exhibit H	IGDL_0001806–IGDL_0001812
IGDL-2020-R-1 - Confidential Exhibit I	IGDL_0001813–IGDL_0001858
IGDL-2020-R-1 - Confidential Exhibit J	IGDL_0001859–IGDL_0001927