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April 11, 2022

FOIA CONFIDENTIAL TREATMENT REQUEST
Pursuant to 17 C.F.R. §§ 145.5 and 145.9

Assistant Secretary of the Commission for FOI, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: FOIA Confidential Treatment: Petition Pursuant to 17 C.F.R. §§ 145.5 and 145.9

To Whom It May Concern:

On this day, Refinitiv US SEF LLC (“**Refinitiv SEF**”) submitted to the Commodity Futures Trading Commission (the “**Commission**”), through the Commission’s Division of Market Oversight, the materials described in Schedule I hereto (the “**Confidential Submission**”).

In accordance with the provisions of Commission Rules 145.5 and 145.9, we hereby request confidential treatment of the Confidential Submission. Confidential treatment is requested, *inter alia*, on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act (“**FOIA**”) and Commission Rules 145.5(c)(1), 145.5(d), and 145.9(d)(1)(ii) because it contains commercial and financial information that is confidential.

We request that the Confidential Submission be afforded confidential treatment for the maximum amount of time permitted.

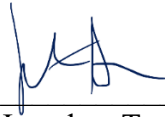
We understand that if the Commission receives a FOIA request for the Confidential Submission, we will be notified of such request in accordance with the Commission’s regulations and be asked to submit, within ten business days, a detailed written justification for confidential treatment of the Confidential Submission. *See* Commission Rule § 149.5(e)(1); see also Executive Order 12600, 52 Fed. Reg. 23781 (June 23, 1987) (detailing pre-disclosure notification procedures under FOIA). In such event, we request 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 all or any portion of the Confidential Submission to another federal agency, we request that you forward a copy of this letter to such agency with the Confidential Submission and further request that you advise any such agency that Refinitiv SEF has requested that this material be afforded confidential treatment.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writing of any sort whatsoever that are made by, or at the request of, any employee of the Commission (or any other governmental 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 Refinitiv SEF, its current or former employees, representatives, agents, auditors or counsel on the one hand and employees of the Commission (or any other governmental agency) on the other, relating to the Confidential Submission.

Please contact me using the information below if you have any questions regarding this request for confidential treatment.

Sincerely yours,



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Confidential Treatment Requested by Refinitiv US SEF LLC

SCHEDULE I
Confidential Submission

The Confidential Submission referenced in the letter to which this Schedule I is attached consists of the following documents (in addition to this Schedule I):

- April 11, 2022 letter addressed to the Commodity Futures Trading Commission with the subject line “Re: Submission 22-01: Refinitiv US SEF LLC – Exhibit B-1”
- Amended Exhibit B-1 from Refinitiv US SEF LLC.