



April 21, 2015

FOIA CONFIDENTIAL TREATMENT REQUEST

VIA Electronic Mail and Overnight Delivery

Assistant Secretary of the Commission for FOIA, Privacy and Sunshine Acts Compliance
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581
Via email: FOIAsubmission@cftc.gov and by overnight delivery

RE: Freedom of Information Act ("FOIA") Confidential Treatment Request for Information Submitted to the Commodity Futures Trading Commission ("Commission") Pursuant to Section 5h of the Commodity Exchange Act and Part 37 of the Regulations of the Commission, by Javelin SEF, LLC, as operator of a swap execution facility

To Whom It May Concern:

Javelin SEF, LLC, ("Javelin"), as operator of a temporarily registered swap execution facility, has submitted to the Commission Javelin's Rule Submission 15-04 regarding Javelin's market maker program (Submission 150-04).

Today Javelin submitted Submission 15-04 through the Commission's portal and by sending a copy by email addressed to Mark Schlegel (mschlegel@cftc.gov). Submission 15-04 is referred to herein as the "Confidential Information". Javelin hereby requests that the Confidential Information be accorded confidential treatment on the grounds that it would reveal the Javelin's trade secrets and confidential commercial and/or financial information. Javelin SEF believes the financial terms of its market maker program are proprietary in nature, as they contain a proprietary method for calculating fees and/or rebates. We request this confidential treatment for an indefinite period.

We understand that if the Commission receives a FOIA request for the Confidential Information, 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

Information. 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 e-mail the following rather than rely upon United States mail for such notice so that we may substantiate the foregoing request for confidential treatment in accordance with Part 145.9 of the Commission's regulations.

Suellen M. Galish
Senior Managing Director
General Counsel &
Chief Compliance Officer
Javelin SEF, LLC
443 Park Avenue South,
New York, NY 10016
Direct Dial: 646-307-5931
Email: suellen.galish@thejavelin.com

If the Commission or its staff transmits any of the Confidential Information to another federal agency, we request that you forward a copy of this letter to any such agency with the Confidential Information and further request that you advise any such agency that the Javelin 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: (i) incorporate, include or relate to any aspect of the Confidential Information; or (ii) refer to any conference, meeting, or telephone conversation between the Javelin and 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 Information.

Pursuant to Part 145.9(d)(4) of the Commission's regulations, we have marked each page of the Confidential Information submitted to the Commission with the words "Confidential Treatment Requested by Javelin SEF, LLC".

Please contact the undersigned at suellen.galish@thejavelin.com or (646) 307-5931 with any questions regarding this matter.

Thank you for your attention to this matter.



Suellen Galish
Senior Managing Director, General Counsel &
Chief Compliance Officer

cc: Mark Schlegel, Division of Market Oversight, Commodity Futures Trading Commission (Email: mschlegel@cftc.gov)