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**360 Trading Networks, Inc.** ∙ 521 Fifth Avenue, 38th Floor ∙ New York, NY 10175

Confidential Treatment Requested by 360 Trading Networks Inc.

April 30th, 2019

**Via Commission Website Portal**

Mr. Christopher J. Kirkpatrick

Office of the Secretariat

Commodity Futures Trading Commission

Three Lafayette Centre

1155 21st Street, N.W.

Washington, D.C. 20581

**Re: 360 Trading Networks, Inc. – Petition for Confidential Treatment**

Dear Mr. Kirkpatrick:

360 Trading Networks Inc. (“360T”) has on this date provided the materials described in Appendix A to this letter (the **“Confidential Submission”**) to the Commission.

In accordance with the provisions of Commission Regulations 40.8, 145.5 and 145.9, we hereby request confidential treatment of the Confidential Submission. Confidential treatment is requested, on the grounds that the Confidential Submission contains information which would disclose trade secrets or confidential commercial or financial information of 360T. Confidential treatment additionally is requested on the grounds that the Confidential Submission is exempt from disclosure under paragraph (b)(4) of the Freedom of Information Act (**“FOIA”**) and Commission Regulations 145.5(d) and 145.9(d)(1)(ii) because it contains commercial information that is confidential.

In accordance with the provisions of paragraph (d)(5) of Regulation 145.9, we request that the Confidential Submission be afforded confidential treatment in perpetuity.

We understand that if the Commission receives 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 Regulation 149.5(e)(1); see also Executive Order 12600, 52 Fed. Reg. 23781 (June 23, 2987) (detailing pre-disclosure notification procedures under FOIA).

If the Commission or its staff transmits any of the Confidential Submission to another federal agency, we request that you forward a copy of this letter to any such agency with the Confidential Submission and further request that you advise any such agency that 360T 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 (1) incorporate, include or relate to any aspect of the Confidential Submission; or (2) refer to any conference, meeting, or telephone conversation between 360T, 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 Submission.

If you have any questions or would like to discuss this matter further, please call me at 44 020 7862 7509, or email at: [martin.oakley@360T.com](mailto:martin.oakley@360T.com)

Very truly yours,

Martin Oakley