

June 9, 2022

VIA Electronic Portal

CFTC FOIA Compliance Office
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W
Washington, D.C. 20581

RE: FOIA Confidential Treatment Request – Modified CME Risk Management Policies

To Whom it May Concern:

On June, 2022, the Chicago Mercantile Exchange Inc. (“CME Clearing”) submitted modifications to the Risk Management Framework (“RMF”), Liquidity Risk Management Framework (“LRMF”), Model Validation Framework (“MVF”), Credit Policy, Collateral Policy, and Investment Policy (collectively, “the Policies”) to the Commodity Futures Trading Commission (“CFTC” or “Commission”) via the CFTC Portal under 40.6(a). The submission consisted of the submission cover sheet and letter and the modified Policies, (the “Confidential Information”).

Pursuant to Sections 8 and 8(a) of the Commodity Exchange Act (“CEA”), as amended, and Commission Regulation 145.9(d), CME Clearing requests confidential treatment for the Policies on the grounds that disclosure of their contents would reveal confidential commercial information of the CME Clearing. Pursuant to Commission Regulation 145.9(d)(5), CME Clearing requests that confidential treatment be maintained until further notice from CME Clearing. We also request that the Commission notify the undersigned immediately after receiving any FOIA request or any other court order, subpoena or summons for same. Finally, we request that we be notified in the event the Commission intends to disclose the Policies to Congress or to any other governmental agency or unit pursuant to Section 8 of the CEA. CME Clearing does not waive its notification rights under Section 8(f) of the CEA with respect to any subpoena or summons for the Policies.

If you have any questions, please contact the undersigned at 312-930-8167 or via email at sean.downey@cmegroup.com.

Sincerely,

/s/Sean Downey
Clearing Chief Compliance Officer & Head of Policy
CME Clearing